



Office for Democratic Institutions and Human Rights

UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND

GENERAL ELECTION 4 July 2024

ODIHR Election Assessment Mission Final Report



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TABLE OF CONTENTS

I.	EXECUTIVE SUMMARY	3
II.	INTRODUCTION AND ACKNOWLEDGEMENTS.....	6
III.	BACKGROUND AND POLITICAL CONTEXT	6
IV.	LEGAL FRAMEWORK AND ELECTORAL SYSTEM	7
V.	ELECTION ADMINISTRATION.....	8
VI.	VOTER REGISTRATION.....	11
VII.	CANDIDATE REGISTRATION.....	14
VIII.	ELECTORAL CAMPAIGN.....	15
IX.	CAMPAIGN FINANCE	17
A.	FUNDING SOURCES	18
B.	CAMPAIGN EXPENDITURE	19
C.	REPORTING AND OVERSIGHT	20
X.	PARTICIPATION OF PERSONS WITH DISABILITIES	22
XI.	MEDIA	22
XII.	ELECTION OBSERVATION.....	25
XIII.	ELECTION DISPUTE RESOLUTION	26
XIV.	ELECTION DAY	27
XV.	RECOMMENDATIONS	28
A.	PRIORITY RECOMMENDATIONS	28
B.	OTHER RECOMMENDATIONS	29
	ANNEX: FINAL RESULTS.....	32
	ABOUT ODIHR	33

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I. EXECUTIVE SUMMARY

Following an invitation from the United Kingdom (UK) Delegation to the OSCE to observe the 4 July general election, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) deployed an Election Assessment Mission (EAM) from 20 June to 8 July 2024. The ODIHR EAM assessed compliance of the electoral process with OSCE commitments, other international obligations and standards for democratic elections, as well as national legislation. In line with the ODIHR methodology, the ODIHR EAM did not observe election day proceedings in a systematic or comprehensive manner but visited a limited number of polling stations.

The election was well-organized and competitive, but several aspects of the process merit further improvement, including enhancing the inclusiveness and accuracy of the voter registers and strengthening campaign finance regulations. While the legislative framework provides a solid foundation for organizing democratic elections, it remains overly complex and contains inconsistencies. The campaign was vibrant, with record candidate participation, active civil society engagement and a robust media environment, enabling voters to make an informed choice. However, there were instances of intimidation and attacks on contestants, as well as widespread online abuse, particularly targeting women candidates.

The United Kingdom is a constitutional monarchy comprising England, Wales, Scotland, and Northern Ireland. Legislative authority is exercised by a bicameral parliament consisting of the House of Lords (higher chamber) and the House of Commons (lower chamber). Voters elect 650 members of the House of Commons in single-member constituencies for five-year terms under a first-past-the-post system. The boundary delimitation review conducted between 2021 and 2023 brought the size of constituencies within a five per cent deviation threshold, in line with national legislation, international good practice and in keeping with a previous ODIHR recommendation.

The 2022 Elections Act introduced amendments related to postal voting, overseas voters, campaign and campaign finance, voter identification, election offences, and the functioning and oversight of the Electoral Commission (EC). While most of the changes were welcomed, some ODIHR EAM interlocutors expressed concerns about the lack of meaningful public consultations, the limitations on the EC's independence due to the imposition of the Government's strategy and policy statement in its work, and the introduction of the obligation for voters to show photo ID for in-person voting. Some previous ODIHR recommendations were addressed, such as revising constituency boundaries and regulating third-party campaigning, but several remain unaddressed, including on campaign donation limits and reporting requirements, the EC's enforcement capacity, and prisoners' electoral rights.

Elections are managed by Returning or Acting Returning Officers (ROs or AROs) and their electoral services teams, while the EC, a centralized independent electoral body accountable to Parliament, oversees the process, and the government develops electoral policy. Overall, the electoral administration carried out its tasks efficiently and professionally, meeting all legal deadlines despite a limited preparation timeframe and intermittent staff shortages.

Voter registration is active, with approximately 48.21 million voters registered. Voter registers are managed at the local authority level without a central register or an efficient data exchange system among counties, which can result in multiple registrations. The voter registration process is outdated

and fragmented, with an estimated 8 million citizens not registered and many entries either missing or inaccurate. Many voters opted to update their entries only after the election was announced, which placed an additional burden on election officials and increased the risk of errors. For this election, the law was amended to allow all citizens living abroad to register, regardless of the duration of their residence abroad.

Several changes were introduced in regard to postal and proxy voting, including reducing the validity of postal vote registration from five to three years and facilitating online applications. Moreover, a short timeframe for processing and managing nearly 10 million postal ballots posed challenges for election administrators and the Royal Mail. Following the 2022 changes, individuals can serve as proxies for a maximum of two other voters (or four for voters abroad), provided these voters are registered in the same constituency as the individual. Despite these requirements, proxy voting is not in line with OSCE commitments, as it does not ensure secrecy and risks undermining respect for voters' choices.

A total of 4,515 candidates were registered, representing 98 of the 392 registered political parties, alongside 459 independent candidates. The candidate registration process was inclusive and straightforward, with most ODIHR EAM interlocutors remarking that it is based on long-established and tested procedures. Following some instances of candidates registering with false or misleading identities following the election, the EC recommended reviewing the registration process to prevent candidates from misrepresenting their identity with the intent to mislead voters.

Despite advancements within both the government and parliament over the past decade, women continue to be less represented in the Cabinet, both houses of Parliament, the senior civil service, as well as among ministers and special advisers in the government. There are no legal requirements for promoting gender equality, leaving such initiatives to political parties. Only some 30 per cent of the candidates were women, but a record number of women were elected, now constituting 40 per cent of the House of Commons.

During the pre-election period, which lasted from 30 May to 3 July, campaign rights and freedoms were respected, fostering an environment conducive to active political participation. However, some instances of intimidation and online harassment were reported, particularly targeting women candidates. Both traditional and digital campaigning methods were employed, with digital campaigns managed by party headquarters. The inconsistent implementation of digital imprinting rules underscored the necessity of standardized regulations to enhance voter awareness. Disinformation and foreign interference were a major topic in the run-up to the election, but no significant cases were reported by election day.

The campaign finance legal framework is comprehensive but imposes different regulatory regimes for political parties, third parties, and candidates, thereby reducing transparency and efficiency in oversight. The EC is responsible for overseeing political parties and campaign finance, including third parties, and is vested with the authority to conduct investigations and impose sanctions. While the campaign finance system is robust, high thresholds for reporting donations, contributions from unincorporated associations, and the potential for foreign illicit donations remain of concern. Most ODIHR EAM interlocutors expressed confidence in the EC's role to monitor campaign finance but emphasized the need for a more comprehensive and clearer oversight regime and stronger sanctions to enhance the deterrent effect.

The Elections Act introduced new obligations for election officials to assist persons with disabilities by providing aids and adaptations at polling stations. Since 2022, the EC has cooperated with disability organizations and other relevant stakeholders to raise awareness about these amendments to facilitate equal access and produced guidelines for election administrators. However, some interlocutors underscored insufficient government actions to promote these efforts, including the lack of funding to

enable candidates with disabilities to compete on equal terms. They also emphasized that political parties do not actively raise awareness of these issues in their electoral platforms or promote candidates and nominate individuals with disabilities.

An overall robust media landscape, including investigative journalism, significantly contributed to the oversight of political power and institutions and provided voters the opportunity to make an informed choice. The British Broadcasting Corporation (BBC) continues to have the strongest news outreach and is highly trusted. However, the decreasing financial sustainability of media outlets and increasing ownership concentration limit the plurality and diversity of news sources, in particular on the local level. Many reported cases of legal intimidation and strategic lawsuits against public participation (SLAPPs) against journalists and media had a chilling effect on public interest reporting and investigative journalism.

Access to legal remedies for electoral dispute resolution is limited due to the associated costs of filing a complaint or appeal, and the lack of timely adjudication hinders the effectiveness of these remedies. Legal standing related to submitting complaints is restricted to voters and candidates. Election results can be challenged through petitions, which are investigated by a dedicated court; however, significant costs are associated with initiating such petitions. Decisions of the ROs and AROs, including on the registration of candidates, cannot be appealed before elections but only through post-election petitions. The number of electoral petitions is historically very low, and no petition contesting the results of these elections was registered. Despite the limitations, the ODIHR EAM interlocutors expressed trust in the election dispute resolution procedures; however, some noted that the current system is outdated and that the financial burden could be prohibitive.

The law allows for domestic and international election observers and explicitly provides for observation of issuing and receiving postal ballots and voting and counting of votes at counting centres, but it does not provide for the observation of other key election procedures, such as voter registration or the nomination and registration of candidates, at odds with international good practice. The largest domestic group conducting observation was Democracy Volunteers, which reported deploying some 200 observers on election day.

In accordance with ODIHR's methodology, the EAM visited a limited number of polling stations but did not observe election day proceedings in a systematic and comprehensive manner. In the visited polling stations, the voting process was orderly, and procedures were largely followed. The same applied in the counting centres on election night, and though there is no official mechanism for publishing aggregate results, media outlets began announcing official results shortly after polls closed.

This report offers a number of recommendations to support efforts to further align elections in the United Kingdom with OSCE commitments and other international obligations and standards for democratic elections. Priority recommendations focus on modernizing and simplifying electoral legislation, enhancing the capacity of election administration and their co-ordination, improving voter registration processes, strengthening the regulation of political donations with anti-money laundering measures, expanding the powers and resources of the EC for effective oversight, strengthening the law and policies to counter strategic lawsuits against public participation, and revising the petition system to ensure an accessible remedy in electoral matters. ODIHR stands ready to assist the authorities with addressing the recommendations contained in this and previous reports, including through a comprehensive review of the electoral legislation.

II. INTRODUCTION AND ACKNOWLEDGEMENTS

Following an invitation from the United Kingdom Delegation to the OSCE to observe the 4 July 2024 general election and based on the recommendation of a Needs Assessment Mission conducted from 28 to 30 May, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) deployed an Election Assessment Mission (EAM) from 20 June to 8 July.¹ The ODIHR EAM was led by Ms Helga Stevens and consisted of five experts drawn from five OSCE participating States, comprising two women and three men.

The electoral process was assessed for compliance with OSCE commitments and other international obligations and standards, as well as national legislation. In line with ODIHR's methodology, the EAM did not observe election day proceedings in a systematic or comprehensive manner but visited a limited number of polling stations.

The ODIHR EAM wishes to thank the Foreign, Commonwealth and Development Office for their co-operation and assistance. It also expresses its gratitude to representatives of other state institutions, the judiciary, civil society, media, the international community and other interlocutors for their co-operation and for sharing their views.

III. BACKGROUND AND POLITICAL CONTEXT

The United Kingdom (UK) is a constitutional monarchy comprising England, Wales, Scotland, and Northern Ireland. It operates as a unitary state but has devolved administrations in Scotland, Wales, and Northern Ireland, each with a varying degree of legislative authority. The King serves as the Head of State with largely ceremonial powers. Legislative power resides in a bicameral Parliament, consisting of a directly elected House of Commons and the House of Lords, with appointed members. Executive power is vested in the Monarch but is exercised by the Prime Minister (PM) and the Cabinet, who are accountable to Parliament. The PM, traditionally the leader of the party or coalition with the most seats in the House of Commons, heads the UK government.

In the December 2019 general election, the Conservative Party secured a substantial majority with 365 seats and formed a government. The Labour Party obtained 202 seats, followed by the Scottish National Party (SNP) with 48 seats, the Liberal Democrats (11 seats) and other smaller parties or independent candidates.² In the outgoing parliament, 35 per cent of the Members of Parliament (225 MPs) were women. There are no legal requirements for promoting gender equality, leaving such initiatives to political parties. Of the 23 cabinet ministers, 7 were women.

On 22 May 2024, Prime Minister Rishi Sunak requested the King to dissolve the Parliament, scheduling a general election for 4 July, and Parliament was officially dissolved on 30 May. The elections took place amid growing political and economic challenges, including debates on the UK's post-Brexit future, handling of public healthcare services, and responses to the climate crisis. The PM's announcement was seen by many, including the opposition, as a strategic move to take political advantage of some recent positive economic indicators.

¹ See all [previous ODIHR reports on the UK](#).

² Including the Democratic Unionist Party with eight seats, Sinn Féin with seven seats, Plaid Cymru with four seats, the Social Democratic and Labour Party with two seats, and the Green Party of England and Wales, and the Alliance Party of Northern Ireland each with one seat. Additionally, the Speaker was re-elected, running as an independent.

IV. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

The legal framework governing elections is comprised of the 1983 Representation of the People Act (RPA), the 2000 Political Parties, Elections and Referendums Act (PPERA), the 2006 Electoral Administration Act (EAA), the 2014 Transparency of Lobbying, Non-Party Campaigners and Trade Union Administration Act and the 2022 Elections Act (EA). The 2023 National Security Act increased sanctions for electoral offences in case the perpetrator acted for a foreign power or on behalf of one. These laws are supplemented by secondary legislation, which includes numerous statutory instruments, rules and orders. In addition, the Electoral Commission (EC) has published several non-binding guidelines which were useful instruments for contestants, election administrators, and other election stakeholders and observers. There are differences in the election legislation among the four constituent countries.³

The 2011 Fixed-term Parliaments Act (FTPA), which provided for a five-year interval between ordinary general elections, was repealed by the 2022 Dissolution and Calling of Parliament Act. The latter reinstated the previous legal mechanism that allows the prime minister to request the Monarch to dissolve Parliament and call an early election without requiring Parliament's approval, at odds with the OSCE commitments.⁴

Consideration could be given to introducing a mandatory parliamentary vote for the dissolution of parliament as a pre-condition for approving the calling of early elections.

The 2022 Elections Act amendments were substantive and introduced a photo ID voter identification for in-person voting in all polling stations, online registration for postal voting, broader opportunities for out-of-country voting, improved accessibility of polling stations, and digital imprints. Several changes were introduced related to political party and campaign finance, including requiring political parties to declare assets and liabilities over GBP 500 when registering and imposing new thresholds and requirements for the activities of third parties.⁵ While the ODIHR EAM interlocutors welcomed most of the 2022 amendments, contrary to international good practice, there was a lack of comprehensive consultations with the stakeholders before their adoption and controversies related to new measures, including on obligatory photo identification, introduced some uncertainties that could have a negative impact on some voters (see *Election Administration*).

Overall, the legal framework provides a solid basis for the conduct of elections; however, it is overly complex, convoluted and outdated, as it comprises more than 100 separate pieces of legislation, at times reducing regulatory transparency. The majority of ODIHR EAM interlocutors, including the EC and civil society organizations, have repeatedly called for the consolidation and simplification of the legal framework.⁶

³ Including on the thresholds for campaign expenditure, third-party registration and regulation of different law enforcement agencies which have investigative roles.

⁴ According to the abolished FTPA, early elections could be organized only if a motion was agreed either by at least two-thirds of the whole House or without division or if a motion of no confidence was passed and no alternative government was confirmed by the House of Commons within 14 days. Out of five motions considered under this Act, [only one was approved](#) by the Parliament in 2017. Paragraph 7.9 of the [1990 OSCE Copenhagen Document](#) enshrines that states should “ensure that candidates who obtain the necessary number of votes required by law are [...] permitted to remain in office until their term expires or is otherwise brought to an end in a manner that is regulated by law in conformity with democratic parliamentary and constitutional procedures”.

⁵ At the time of elections, GBP 1 was approximately EUR 1.185.

⁶ See the 2020 UK Law Commission [report](#), the 2019 House of Commons Public Administration and Constitutional Affairs Council (PACAC) [report](#), the 2021 Association of the Electoral Administrators [report](#) and the 2021 Committee of Standards of Public Life [report](#). The EC has also [advocated](#) for the simplification and update of legislation.

As previously recommended, consideration should be given to a comprehensive review of the legislation well in advance of the next elections to harmonize, clarify and update respective laws. To enhance gender equality and mainstream gender considerations in the legal system, gender-neutral language should be utilized in the drafting of the electoral legislation.

Several previous ODIHR recommendations were addressed through recent legislation, including revising the boundaries of constituencies, introducing additional regulations regarding third-party campaigning, and the requirement that a voter presents proof of identity. However, many other recommendations remain unaddressed, including establishing the size of constituencies based on population rather than the electorate, introducing annual donation limits, lowering the thresholds for reporting donations by parties, increasing the EC's investigative and sanctioning powers related to spending and donations, and bringing the electoral rights of prisoners in line with international standards.

Legislative authority in the UK is exercised by a bicameral parliament consisting of a directly elected House of Commons with 650 members and the House of Lords with more than 800 appointed members.⁷ Elections for the House of Commons are conducted for a maximum five-year term under a first-past-the-post system in single-member constituencies; candidates who received the highest number of votes in each constituency are elected. Several ODIHR EAM interlocutors pointed out that this system has specific characteristics that shape voter and candidate behaviour. Voters may engage in 'tactical voting', choosing candidates they believe are most likely to win in their constituency. At the same time, candidates and parties tend to concentrate their efforts on competitive constituencies, where small changes in voter preferences could influence the outcome.

The process of reviewing constituency boundaries was completed in June 2023 and formally approved by Parliament in November 2023, in due time ahead of the 2024 general election.⁸ The delimitation of constituency boundaries is managed by the respective Boundary Commissions from England, Scotland, Wales and Northern Ireland.⁹ This long-awaited review resulted in equalizing a long-standing disbalance in the sizes of the electorate across all constituencies to fall within the legally prescribed 5 per cent variation from the average size. The review process, which had several phases, was open to suggestions and comments from stakeholders and the public.¹⁰

V. ELECTION ADMINISTRATION

Returning Officers (ROs) or, in their place, acting ROs (AROs) manage the elections on the county level. They are responsible, among others, for registering voters, dealing with absentee voters,

⁷ The number of peers [is not fixed](#) and includes politicians, clergy and members with a wide range of occupations who are constantly appointed, and some of who retire or resign. Most members are appointed by the Monarch on the advice of the Prime Minister to serve for life. As a result of the 1999 House of Lords Act, 92 peers are members by virtue of hereditary title.

⁸ Previous constituency boundaries had been in use in Scotland since 2005 and in the rest of the UK since 2010. The [review](#) took place between 2021 and 2023 with its recommendations submitted to the House of Commons for its approval in June 2023. The England Boundary Commission had further [published](#) in an easy-to-read format the methodology of its own review. Further [details](#) from Parliament explained how the UK constituency boundaries were changed and provided maps of how the previous constituencies relate to the new ones.

⁹ The electorate quota is the average number of voters per constituency. The data used as the basis for the calculation of the electoral quota was from March 2020, with 47,1 million registered voters. The four boundary commissions had the discretion to deviate from the quota using other considerations, such as local ties and geographical features.

¹⁰ Consequently, England is now composed of 543 constituencies (an increase of 10 compared the previous elections), Wales 32 (a decrease of eight), Scotland 57 (a decrease of two) and Northern Ireland remains unchanged with 18.

managing polling stations and administering the vote count.¹¹ The ROs and AROs are appointed from among senior managers within the councils and are helped by electoral services teams comprising, on average, four to five permanent senior staff.

At the national level, the EC oversees elections without administering them directly.¹² The EC is a permanent, independent body established in 2001 which reports to the Parliament, and its main tasks include registering political parties, overseeing the financing of political parties and third parties, monitoring the work of the election administration for their performance, issuing guidance to electoral bodies and contestants, and public awareness campaigns. For these elections, the EC organized various information campaigns in some 20 community languages, including on the photo ID requirement.

At the national level, the Secretary of State for Levelling Up, Housing and Communities (MHCLG) is responsible for developing electoral policy on behalf of the government, adopting secondary regulations, proposing new legislation and developing digital systems to support election administrators.

The EC supported the ROs and AROs with a series of guidance documents to assist them in implementing a fragmented legal framework in the respective categories of electoral operations, including voter and candidate registration, campaigning and campaign finance.¹³ This mechanism allowed for consistent uniformity and standardization in administering elections.

The election administration generally enjoyed stakeholder confidence in its ability to conduct elections in an independent and impartial manner. However, in some locations, the increased complexities in the work of polling and counting staff, combined with a relatively modest remuneration, led to difficulties in finding and retaining sufficient staff. This was further exacerbated in Scotland and Northern Ireland due to the holiday periods. These challenges led to an increased risk of not fully adhering to procedures in some locations.

The EC published the election timetable in accordance with the 2022 Dissolution and Calling of Parliament Act.¹⁴ However, completing all preparations on time, including finalizing the digital election management systems, recruiting and training polling and counting staff, and printing election materials, was a significant challenge for many election administrators.¹⁵ While no critical issues were reported during or after the election, the short preparation time, given that elections can be called at short notice, could pose a significant risk in the future. In addition, many procedures were implemented for the first time following the 2022 amendments, which placed an additional burden on the election officials.¹⁶

¹¹ In Northern Ireland, the Chief Electoral Officer at the Electoral Office administers elections with the support of local councils.

¹² The parliamentary Speaker's Committee oversees the recruitment of the EC commissioners and nominates them for approval by the House of Commons and appointment by the Monarch.

¹³ See also a [security advice](#) for election administrators and candidates and agents published by the MHCLG. Additionally, the EC issued [bulletins](#) on a regular basis for England, Scotland and Wales providing a summary of key messages to ROs, AROs, EROs, their staff and other stakeholders. Election services teams coordinated the preparation of elections with candidates and their agents as required by law and published on city councils' websites specific electoral information pertaining to their localities.

¹⁴ Instructions authorizing the holding of a general election were issued on 31 May in line with the [EC generic timetable](#). See an [explanatory article](#) by the Institute for Government.

¹⁵ Including printing of some 50 million voter cards and ballot papers and 10 million postal voter packages.

¹⁶ After the elections, in October 2024, the EC published a [report](#) in which characterized the pressure on the capacity election officials due the timing for holding elections, the number of legislative changes being implemented for the first time, the implementation of the new parliamentary boundaries, and the capacity to find and retain sufficient staff.

To ensure effective election preparations and minimize the risks of errors in implementing election procedures, the law should be amended to allow for adequate time between the dissolution of Parliament and election day.

The EC was composed of 10 commissioners, including seven women. The legislation does not require the collection of any gender-disaggregated data, including for the composition of polling and counting staff, and the EC does not collect and publish such data.¹⁷ According to some ODIHR EAM interlocutors, including county-level election officials, the composition of county election administration is gender-balanced, and the representation of women is estimated to be 60 per cent at the polling station level.¹⁸

To promote gender equality and improve accessibility to gender-related data, information about the composition of the electoral administration should be made available in a comprehensive manner.

The EC board, composed of the commissioners and the executive team, typically meets once a month and less regularly outside the election periods, and it is mainly concerned with strategic issues rather than organising the polls. The last meeting prior to the election was held on 20 May 2024.¹⁹ The government and the EC co-chaired election preparation meetings, open to representatives of professional electoral bodies and electoral services.²⁰

The 2022 Elections Act gave the government powers to designate a Strategy and Policy Statement setting out the government's priorities and the role and responsibilities of the EC in enabling the government to meet those priorities. The EC is required to have regard to the Statement and publish an annual report on what they have done in consequence of the Statement. The Statement is subject to a five-yearly review. The majority of ODIHR EAM interlocutors qualified this document as politicized and argued it might affect the independence of the EC, while the commission itself viewed that the strategy undermined its independence and could lead to interference in its work.²¹ According to the election administrators whom the ODIHR EAM met, the EC acted independently and in an unbiased manner; however, most ODIHR EAM interlocutors maintained that repealing this provision would enhance confidence and trust.²²

To maintain full public confidence in election administration, the authorities should review the need for the Strategy and Policy Statement for the Electoral Commission. In case this instrument is kept, its contents should be reviewed to exclude any negative impact on the commission's status as an independent body.

¹⁷ Paragraph 40.13 of the [1991 OSCE Moscow Document](#) commits participating States to 'ensure the collection and analysis of data to assess adequately, monitor and improve the situation of women'.

¹⁸ The EC has approximately 200 staff. According to the 2020 [guide](#) on the EC produced by the National Audit Organization, women represented 56 per cent; and 44 per cent were men.

¹⁹ Meetings are not open to political parties or to election observers, but the [minutes](#) of these are published.

²⁰ Agendas address, for example, staffing, polling and counting venues, postal voting – including production and delivery and overseas voters, cross-boundary constituencies, candidate security and photo ID awareness.

²¹ On 29 February 2024, the government published a policy [statement](#). Prior to this, the EC issued a briefing [document](#) on its website in January 2024 noting that "The introduction of a mechanism such as a strategy and policy statement – by which a government can guide an electoral commission's work – is inconsistent with this independent role."

²² The Association of Electoral Administrators' (AEA's) Consultation response to the draft Electoral Commission Strategy and Policy Statement [notes](#) that "[t]he draft statement sets out certain areas as priorities. This has the potential to add confusion and, of greater concern, unnecessary external influence".

VI. VOTER REGISTRATION

Citizens of the UK and the Republic of Ireland who are at least 18 years old by election day and are included in a voter list have the right to vote. Commonwealth citizens with indefinite leave to remain in the UK can also register to vote. Commonwealth and Irish citizens may only register if residing in the UK,²³ while UK citizens residing abroad can register and vote either by post, by proxy or a combination of both if they have previously registered or lived in the UK.²⁴ The law maintains a broad restriction on the rights of voters serving a prison sentence, irrespective of their conviction.²⁵ Such restrictions are contrary to OSCE commitments and international standards.²⁶

The blanket deprivation of voting rights of citizens serving a prison sentence should be revised in line with international standards.

Following the adoption of the Elections Act in 2022, all British citizens living abroad have the right to register, regardless of the duration of their residence abroad, thereby removing the previous long-standing eligibility limitation of up to 15 years of residence abroad.²⁷ ROs and AROs were responsible for processing and monitoring overseas voter applications, and many ODIHR EAM interlocutors raised concerns about their capacity to deliver such services effectively, given the limited time they had for voters to receive, complete and return their ballots by the deadline of the closing of the polls to be counted.

The voter registers are managed by the Electoral Registration Officers (EROs) at the local authority level, and there is no central electoral register.²⁸ Many ODIHR EAM interlocutors stressed that this process is inefficient, resource-intensive and does not ensure the completeness and accuracy of the voter registers. They also underlined that in periods when there are no elections, voters often do not actively update their voter registration data if there is some change, such as a change of address, resulting in a rush to update once the elections are announced. Voters could apply in person, by post or online, and the registration was closed on 18 June.²⁹

The EROs must allow the public to inspect the voter register under their supervision. If a voter is removed from the register, they have 14 calendar days to appeal the decision, with the final decision resting with the county court. Citizens can have permanent residence in more than one place if they

²³ Commonwealth citizens include those of the [British Crown dependencies](#) and [British Overseas Territories](#).

²⁴ Citizens have the option to register anonymously for up to a year, allowing their details to remain unlisted. This option is available to individuals such as survivors of domestic abuse, stalking, or threats, and requires supporting evidence, such as a court order or a letter from a police officer or social worker.

²⁵ The ban does not apply to persons awaiting trial or sentencing, detained for contempt of court or failure to pay a fine, or to offenders under house arrest and released on temporary license if they are not in jail. In 2005, ECtHR ruled in the case [Hirst v United Kingdom \(no. 2\)](#) that the ban on voting on all serving prisoners contravenes Article 3 of Protocol 1 of the 1950 [European Convention on Human Rights \(ECHR\)](#). Similar conclusions were reached in [Greens and MT v UK](#) (2010), [Firth and Others v. the UK](#) (2014) and [McHugh and Others v UK \(2015\)](#). In 2017, the Government [limited](#) the ban through administrative changes to allow prisoners released on temporary licenses to vote and, in 2018, the CoE Committee of Ministers (CM) closed the examination of the above mentioned cases. For Scottish elections, prisoners serving sentences of up to twelve months can vote in Scottish Parliament and local elections.

²⁶ Paragraph 24 of the 1990 [OSCE Copenhagen Document](#) provides that restrictions on rights and freedoms must be “strictly proportionate to the aim of the law”. See also Paragraph 14 of [General Comment 25](#) to Article 25 of the 1996 [ICCPR](#) and Section I.1.1.d.iii of the 2002 Venice Commission [Code of Good Practices in Electoral Matters](#).

²⁷ The Government [estimated](#) that 2.3 million British citizens became eligible to vote following this change.

²⁸ As an exception, Northern Ireland has one single national register maintained by the Chief Electoral Officer.

²⁹ The Individual Electoral Registration (IER) system for online registration is maintained and overseen by the UK government whereas the individual EROs are responsible for processing the voter applications for their constituents.

have a certain degree of permanence in each of them.³⁰ In the absence of a national voter register or a system for efficient information exchange, this can result in multiple registrations.

Based on the official results of the 2024 general election, the total number of registered voters was 48.21 million.³¹ The 2023 report by the EC on the accuracy and completeness of the registers estimated that across the UK, up to 8 million citizens (17 per cent) were not registered in the local government registers at their current address.³² Prior to the 2024 elections, the EC reported that some 2.8 million voters applied for registration between 22 May and 27 June, recognising that a significant proportion were applications of voters who are already registered.³³

To ensure the accuracy of voter registers and avoid multiple registrations, the authorities could consider introducing a UK-wide voter register or a voter information exchange system for use by Electoral Registration Officers. Voters should have an easy-to-use possibility to check their registration online.

Following the 2022 amendments, the law obliges voters to present an eligible photo ID in order to vote in general elections.³⁴ This requirement was applied for the first time in the local elections in England on 4 May 2023 and again in England and partially in Wales on 2 May 2024. Although many ODIHR EAM interlocutors accepted the government's declared motivation to increase the integrity of voter identification, several interlocutors questioned the rationale given the very small number of cases of impersonation fraud identified and also criticized the lack of wider consultations when proposing the bill.³⁵ The list of permitted documents excluded some that are frequently used by young people and students, meaning that they could be disproportionately affected.

Following the 2023 local elections, some election stakeholders, including domestic observers, reported that several voters residing in economically disadvantaged areas, ethnic minorities, and women were less likely to go to the polls due to the photo ID requirement.³⁶ The 2023 recommendations by the EC called for the list of permitted photo IDs to be reviewed to identify possible addition; however, a potential expansion of the permissible IDs was not endorsed by the government ahead of the 2024

³⁰ For instance, students can also be registered at two places as they often live at two different addresses, one during term time and one during the holidays.

³¹ See election [results page](#) by the BBC. The Office of the National Statistics [maintains](#) electoral statistics, which as of December 2023, includes 40,426,736 (83.5 per cent) million voters registered in England, 4,077,152 million (8.6 per cent) in Scotland, 2,346,279 million (4.9 per cent) in Wales, and 1,363,961 million (2.9 per cent) in Northern Ireland.

³² See the 2023 EC [report](#) on electoral registers, the 2024 [report](#) by the House of Commons Levelling Up, Housing and Communities Committee which, *inter alia*, recommended to reform the individual electoral registration system, as it is currently ineffective, to address under-registration and to improve accessibility of voters with disabilities. See also the corresponding [report](#) by the EC and a separate [response](#) by the MHCLG.

³³ See the [report](#) on 2024 UK general and local elections.

³⁴ Northern Ireland has its own electoral identity card system since 2002.

³⁵ See also the 2023 Constitution Society [report](#) and the 2023 AEA Post Polls [review](#) which in general concluded that the photo ID requirement disproportionately affected certain groups who lacked valid ID, leading to potential disenfranchisement, the process for obtaining voter authority certificates was complex and the variety of acceptable IDs created confusion for both voters and election administrators.

³⁶ The EC estimated that four per cent of people who did not vote in the 2023 local elections gave as the reason lack of photo ID and that some 14,000 voters were turned away due to lack of photo ID and did not return later. Democracy Volunteers during the May 2024 local elections [reported](#) that 2.1 per cent of voters were turned away because they lacked the relevant ID. Of those turned away, 70 per cent were identified by Democracy Volunteers' observers as being 'non-white passing', of which 63 per cent were women. A June 2024 [study](#) by the University of Birmingham shows that 25 per cent of UK transgender persons are unlikely to vote in any future election because of the photo ID requirement.

general election.³⁷ Overall, the potential obstacles in obtaining appropriate IDs by some voters challenge the international standards and OSCE commitment to equal voter participation.³⁸

To facilitate voter identification for voters without a photo ID, the law provides for the issuance of a Voter Authority Certificate (VAC) by the Ministry of Housing, Communities and Local Government (MHCLG) as a free-of-charge service. From January 2023 until the deadline of 26 June 2024, the MHCLG issued 215,397 VACs.³⁹

To facilitate equal participation of voters, election authorities could conduct a comprehensive survey to determine the impact of the photo ID requirement on different categories of voters, especially young voters, ethnic minorities, women, and transgender persons.

Voters could apply to vote by post. The 2022 legal amendments effectively shortened the period of validity for registration by post from five to three years.⁴⁰ The act also introduced the option to apply online and reinforced the identity-checking process.⁴¹ Voters could register by post by 19 June. They could also bring their postal ballot in person to a polling station or to a local council and could hand in up to five postal votes in addition to their own.⁴² All ODIHR EAM interlocutors stressed that election administrators and the Royal Mail had to work at full capacity to print and distribute almost 10 million postal votes.⁴³ Logistical challenges and capacity limits, compounded by the complexity of the process, essential security checks, and the contracted election timetable, created risks of delays. Since ballots could only be printed after candidate registration was finalized, this further threatened their timely receipt for counting.⁴⁴

³⁷ See the 2023 [report](#) and recommendations of the EC issued in relation to the local elections in England. The government [responded](#) that the [list](#) of 22 accepted identification documents strikes a balance between security and accessibility, and is manageable for polling station staff. It noted that research indicates that 96 per cent of voters already have an accepted form of photo ID, suggesting that adding more types would have minimal impact on voter inclusion. A post-election survey showed that passports and driving licenses combined accounted for almost 86 per cent of the documents presented at polling stations.

³⁸ Article 7.3 of the 1990 [OSCE Copenhagen Document](#) includes a “guarantee universal and equal suffrage to adult citizens”. Article 25 of the [ICCPR](#) enshrines that “every citizen shall have the right and the opportunity, without any distinction and without unreasonable restrictions [...] to vote and to be elected at genuine periodic elections, which shall be by universal and equal suffrage [...]”. Paragraph 11 of the 1996 [General Comment 25](#) to Article 25 of the ICCPR stipulates that “[s]tates must take effective measures to ensure that all persons entitled to vote are able to exercise that right.”

³⁹ A [study](#) by IFF Research commissioned by the government in 2021 found that around 2.1 per cent of citizens did not have a permissible form of identification. The evaluation [report](#) commissioned by the MHCLG in May 2023 concluded that 96 per cent of voting age adults had an accepted form of photo ID, two per cent did not, one per cent preferred not to say and one per cent did not know. [The EC analysis conducted in 2023](#) showed that nearly 89,500 VAC’s demands were processed, and around 25,000 were used at the local elections in May 2023. [According to the MHCLG](#), an estimated 57,500 requests (97 per cent) were received after the call of the 2024 general election.

⁴⁰ Previously, a postal vote arrangement was valid indefinitely, if the voter submitted a new signature at least once every 5 years. For voters who applied for a long-term postal vote before 31 October 2023, the registration will expire on 31 January 2026, unless it is extended.

⁴¹ According to the MHCLG, in advance of the 2024 local and general elections, 84 per cent of the 1.79 million new postal voting applications were processed online.

⁴² Campaigners can hand deliver ballots for other voters only if those are close relatives or someone under their regular case. In Northern Ireland, postal votes cannot be handed in at polling stations; however, they can be returned to the ROs.

⁴³ Royal Mail representatives informed the ODIHR EAM that approximately 7 million postal voting packs were sent by post.

⁴⁴ According to the BBC, Scotland was more impacted by the holidays as it started earlier forcing more voters to apply for postal voting. The EC [published](#) on election day that a record number of postal votes were successfully returned, but that some arrived too late. In 2019, the EC [reported](#) that 84 per cent of the postal votes issued were returned and, of these, 2.2 per cent were rejected due to various reasons. Following the election process, the Electoral Commission [recommended](#) a review of the digital systems that the election administrators rely on to enhance efficiency and reliability of postal voting.

Voters could, under certain circumstances, ask another person to vote on their behalf (proxy voting).⁴⁵ The 2022 Elections Act introduced several changes to the system of proxy voting. It allowed voters to apply online and implemented an identity verification process for applications similar to that for postal voting. Additionally, it restricted individuals to acting as proxies for a maximum of two voters, with an exception allowing two additional proxy votes for overseas voters. The act also required that proxies are registered voters and mandated that the proxy cast the ballot at the polling station of the voter who initiated the process.

Overall, the use of proxy voting is not in line with OSCE commitments and other international standards for democratic elections, as it does not ensure the secrecy of the vote and risks undermining respect for voters' choices.⁴⁶ For the 2019 general election, the EC estimated that proxy votes counted for not more than one per cent of the total ballots cast.⁴⁷

Consideration should be given to cancelling the use of proxy voting and exploring alternative voting methods which duly uphold the OSCE commitments and other international standards for democratic elections.

VII. CANDIDATE REGISTRATION

A candidate must be a British citizen, a citizen of the Republic of Ireland, or a Commonwealth citizen who has leave to remain in the UK or does not require leave to remain and be over 18 years of age. Members of the House of Lords, senior civil servants, judges, ambassadors, and officers in the army and police cannot stand as candidates for the House of Commons.⁴⁸ According to the 2022 Elections Act, the individuals convicted of an intimidatory criminal offence motivated by hostility towards a candidate, prospective candidate, campaigner, or holder of a relevant elective office are not able to stand for up to five years following the conviction.

At the time of the election, the EC register contained almost 400 political parties. To be registered, candidate nominations had to include an expression of support from ten voters registered in the given constituency. To stand on behalf of a party, they had to produce a certificate authorising them to use the party's name. Additionally, a deposit of GBP 500 had to be submitted, which is returned if the candidate obtains more than five per cent of the votes.⁴⁹

The candidate nomination period took place from 3 to 7 June. A total of 4,515 candidates were nominated the highest number to date.⁵⁰ A total of 98 parties nominated candidates, with 35 of these parties fielding a single candidate. Additionally, 459 individuals stood as independent candidates in 317

⁴⁵ Including being away on polling day, being registered as an overseas voter, having a medical issue or disability, not being able to vote in person due to work or military service. Voters could apply through an online [service](#) of the Government website. According to the MHCLG, an estimated 93 per cent of the 304,763 applications in 2024 were completed online.

⁴⁶ Paragraph 7.4 of the [1990 OSCE Copenhagen Document](#) commits participating States to 'ensure that votes are cast by secret ballot or by equivalent free voting procedure'. See also Article 25 of the [ICCPR](#) and Paragraph 20 of the [1996 CCPR General Comment No. 25](#).

⁴⁷ [As reported by the EC](#), a total of 274,684 electors appointed a proxy (0.58 per cent of the electorate) in 2019, or an average of around 420 per constituency in line with the information collected from some ROs and AROs. The EC is yet to publish the proxy voters' data for 2024.

⁴⁸ In addition, persons who are subject to bankruptcy restrictions in England and Wales, or a debt relief restrictions order, persons who have been adjudged bankrupt in Northern Ireland and persons who have their estate sequestrated in Scotland are not eligible.

⁴⁹ GBP 1 is approximately EUR 1.20.

⁵⁰ See the candidate summary [report published by the Democracy Club](#).

constituencies. There are no legal provisions for mandating or encouraging quotas for women candidates. Approximately 30 per cent of the candidates were women, and depending on the political party, women nominated by parties ranged from 16 to 46 per cent.⁵¹

Legislative measures or other temporary special measures should be considered to promote the inclusion of women candidates. Political parties could consider ways to further increase gender balance.

Overall, the candidate registration process was straightforward and inclusive, and most ODIHR EAM interlocutors noted that it is based on long-established and tested procedures. Some election administrators noted they were keen to look at ways in which digitalization could simplify the registration process. In its 2024 report, the Electoral Commission recommended that the candidate registration process be reviewed to exclude the possibility of candidates misrepresenting their identity with the intent to mislead voters, which is possible due to the lack of identification requirements.⁵²

VIII. ELECTORAL CAMPAIGN

Campaigning started immediately after the announcement of elections on 22 May. The official campaign period began with the dissolution of Parliament on 30 May 2024 and lasted 25 days. The campaign is largely unregulated, except in terms of campaign spending (see *Campaign Finance*). All printed election materials must include an imprint stating who is responsible for producing and publishing the material. By law, candidates are entitled to send one election communication free of charge to every voter in their constituency. Campaigning is prohibited only within polling stations and their immediate vicinity on election day.

The campaign was moderate in tone and centred around economic stability and recovery, emphasising the lowering of the cost of living and the expansion of job opportunities and housing programmes. Improving health services and expanding social care services featured prominently in the manifestos of a number of parties, particularly the Labour Party, while the issues of immigration and national security resonated in the manifestos of parties on the right of the political spectrum. While the main parties at the national level mostly avoided the term ‘Brexit’ in their messaging, smaller parties and those focusing on Scotland, Wales, and Northern Ireland discussed its impact more directly.

Candidates interacted directly with voters and participated in public events, including TV debates between the leaders of the political parties, overall enabling voters to make an informed choice. In general, the electoral environment facilitated active political participation, and candidates’ political rights and freedoms were respected. However, several contestants informed the ODIHR EAM that the conduct of the campaign was challenging due to the heightened atmosphere. Regrettably, a number of instances of intimidation and physical and verbal attacks on candidates were reported by their campaign teams.⁵³ These attacks prompted the Chief Executive of the Electoral Commission to state that while

⁵¹ Reform UK (16 per cent), Workers (18 per cent), Independent (22 per cent), Liberal Democrats (28 per cent), Conservatives (34 per cent), Green (43 per cent) and Labour (46 per cent). The average age of all candidates was estimated to be 51.

⁵² See Recommendation 5 of the EC [report](#) on the 2024 elections.

⁵³ A Labour candidate Stella Creasy’s office in Walthamstow was [attacked](#) on 23 June. On 2 July, the office of an independent candidate, Tanushka Marah, in Hove was [vandalised](#). Other physical attacks included an [attack](#) on a Conservative Party supporter on 1 July, which resulted in head injuries, while on the same day, Wajad Burkey (the Workers Party of Britain) [informed](#) that he suspended his campaign after his son was attacked. A postman [defaced](#) Reform UK leaflets he was delivering. There was a [report](#) by Channel 4 television about a Reform UK candidate who was spreading dangerous speech. Labour MPs Jess Phillips and Shabana Mahmood [faced](#) harassment and verbal attacks during the campaign.

the campaign was robust and vibrant, the level of abuse and intimidation of candidates was unacceptable. A specific issue mentioned by political camps was abuse in the online environment, a widespread phenomenon in which women candidates, in particular, were subject to gender-based harassment and stereotyping.

Political parties and candidates employed both traditional and digital methods to reach voters, with direct contact being of particular importance, including door-to-door canvassing and meetings with candidates organised by local communities and churches (so-called ‘hustings’), where candidates debated policies and answered questions from the public.⁵⁴ While candidates primarily campaigned on the issues that were important to their local communities, they also maintained consistency with overall campaign messages as set out by their parties and were, in many cases, required to consult with party HQs on campaign-related communications.

Although many candidates also ran digital campaigns focusing on their constituencies, bulk campaigning online was mostly managed by party headquarters via dedicated teams. The development of digital advertising and its more massive use in campaigns appeared to allow party headquarters to directly target specific local areas, *de facto* circumventing candidate spending limits of candidates by mixing national and local campaigning (see also *Campaign Finance*). The regulation of campaign finance reporting does not fully address the accounting of mixed campaign activities. According to many ODIHR EAM interlocutors, the digital campaign was generally more negative in tone compared to traditional campaigns.

While disinformation was a topic of discussion in the run-up to the election, including increased vigilance and precautionary measures against foreign interference, no major cases were noted during the campaign. While the 2023 Online Safety Act includes legal requirements for big tech platforms to proactively assess and mitigate risks related to illegal content, which includes harmful misinformation and foreign interference, the act came into force only after the 2024 general election.⁵⁵ In addition, some ODIHR EAM interlocutors considered that the relatively uncontroversial campaign itself was also a factor. However, some interlocutors highlighted the long-standing lack of transparency and accountability of large tech companies and called for more robust regulation of the online environment overall to prevent the spread of manipulative content and foreign interference.

Printed election materials must include the details (imprint) of who is responsible for their production or procurement, which must appear on all posters, placards and leaflets. According to the 2022 Elections Act, imprints are also required on certain digital materials, including both sponsored and organic social media posts, if published by or on behalf of a candidate, political party of elected office holder. However, due to the challenges of effectively regulating digital imprints in the context of an evolving digital campaign environment, the rules that applied for the first time in the 2024 general elections were interpreted differently by various parties, resulting in reduced effectiveness of regulation in this area. Most ODIHR EAM interlocutors considered that voters were not sufficiently aware of the legal requirements and how they are to be implemented. Both candidates and NGOs indicated that in the

⁵⁴ Each candidate is entitled to one free mailing by Royal Mail to voters in the constituency they are contesting. Candidates can use public spaces for election events. This is usually facilitated by local authorities, which provide access to suitable venues for rallies, public meetings and other campaign activities.

⁵⁵ The 2023 [Online Safety Act](#) and the 2023 [National Security Act](#) require tech platforms to address foreign interference and misinformation, and social media platforms have to proactively manage and mitigate the risks associated with state-sponsored disinformation and foreign interference, with penalties for non-compliance. According to Office for Communications (OfCOM)’s [draft guidelines](#), the platforms must put in place proportionate systems and processes which go beyond reactive moderation, including using tools like automated content detection systems, keyword filters, and moderation teams to identify potentially harmful or illegal material, as well as design features that limit how quickly such content can spread. Platforms must also consider user reports, behavioural patterns, and other available information to make informed decisions, all while ensuring that users’ privacy and freedom of expression are respected.

future, it would be beneficial to have visual examples of imprints on different types of campaign materials in advance of the campaign, which would help to make the imprint requirement more effective and consistent on digital campaign materials.

Several ODIHR EAM respondents called for greater real-time transparency regarding individual targeting of political advertising online. They also supported further regulation of online advertising to address the fact that paid political advertising by political parties in traditional broadcast media is banned, while online advertising is essentially unregulated.

To enhance transparency and consistency in applying the rules for digital imprints on campaign materials, the election administration should develop and disseminate clear guidelines, including visual examples.

IX. CAMPAIGN FINANCE

The campaign finance legal framework is composed mainly of the 1983 RPA, the 2000 PPERA, the 2009 Political Parties and Elections Act (PPEA), the 2022 Elections Act, and the 2014 Transparency of Lobbying, Non-Party Campaigners and Trade Union Administration Act. The RPA regulates the activities of candidates, while the PPERA regulates political parties, third parties, membership associations, and elected officials. Several previous ODIHR recommendations, including those on imposing an annual donation limit per donor, shortening the reporting period, and lowering the reporting threshold, remain to be implemented. Some of the ODIHR EAM interlocutors noted that the 2022 legal reform failed to resolve outstanding issues related to campaign finance, including increasing the transparency of funding from companies and unincorporated associations, as well as enhancing the oversight and sanctioning of violations.⁵⁶

The EC produced statutory and non-statutory guidelines for stakeholders.⁵⁷ The 2022 EA introduced a number of clarifications, including a ban on political parties to register with the EC as political parties if they are already registered as third parties and added a new tier of registration for third parties if they exceeded GBP 10,000 in campaign spending and imposed a ban on the expenditure of more than GBP 700 during a regulated period if they are ineligible for registration.⁵⁸ The EA regulated the possibility of adding, changing, or removing categories of third parties through a ministerial order at the recommendation of the EC, which raised concerns among several stakeholders.⁵⁹ The act introduced the requirement of authorization for in-kind or discounted goods or services to be considered as expenditures by a candidate, political party or third party.⁶⁰

In 2023, the government issued a statutory order that significantly increased the thresholds for candidate and party spending (by 80 per cent) and for reporting donations (by 49 per cent), which reduced

⁵⁶ In the 2023 [report](#) on public attitudes, the EC highlighted that 58 per cent of those interviewed considered political funding to be non-transparent.

⁵⁷ There are guidelines on financing for [candidates](#), [parties](#), [third parties](#). Non-statutory guidelines are advisory.

⁵⁸ Third party campaigners are defined as individuals or organizations that campaign for or against political parties or candidates or engage in political activities intended to influence election outcomes but are not standing.

⁵⁹ See the [Electoral Reform Consultation Analysis](#) by the Scottish Government, the assessment of Transparency International and the [transcript](#) of debates within the House of Lords.

⁶⁰ Before the amendment on notional expenditure, which includes property, goods, and services provided free of charge or at a discount (including by political parties), the law did not specifically require the approval by a candidate or an agent to use them as campaign expenditure and declare it as such. According to the 2022 EA candidates only need to report benefits they actually used, or directed or encouraged someone else to use and are not responsible for benefits in kind of which they had no knowledge. Similar amendments were made for political parties and third parties. See the 2018 [Supreme Court v. Mackinlay and others](#), that contributed to the 2022 reform.

transparency.⁶¹ Even though motivated by inflation and the fact that the most recent update for some of these thresholds was approved some 10 years ago, such an abrupt increase appears unjustified and is disproportionate to the aim of providing limitations to prevent the possibility of distorting the campaign through excessive funding.⁶²

To ensure the transparency of campaign finance, consideration could be given to lowering the established reporting thresholds and setting expenditure upper limits to ensure a level playing field.

A. FUNDING SOURCES

Political parties are mostly privately funded, including through donations, membership fees and loans.⁶³ Public funding is limited, available mostly for opposition parties but not designated for use in election campaigns.⁶⁴ There are no limits on membership fees or the amount of donations that can be made to political parties, candidates, or third parties, which could lead to a disproportionate impact on the contestants' ability to campaign effectively and is at odds with international good practice.⁶⁵ Electoral contestants are provided with indirect benefits, including the possibility of sending campaign materials to voters by post, free use of public venues, and free airtime on public broadcasters.

In line with international standards, consideration could be given to imposing an annual donation threshold for a permissible donor to prevent the undue influence of large contributors.

Donations over GBP 500 for parties and third parties and GBP 50 for candidates are only permitted from registered voters or certain types of UK-registered entities.⁶⁶ The funding source under these thresholds is not verified, which could lead to repeated anonymous donations from the same sources, at odds with international good practice.⁶⁷ Recipients are not required to use anti-money laundering

⁶¹ See the 2023 statutory [order](#). Among others, the expenditure limits for parties were raised from GBP 18 to 34 million, and the donation reporting thresholds from GBP 7,500 to GBP 11,180.

⁶² Paragraph 19 of [General Comment 25](#) to Article 25 of the ICCPR states that the “[r]easonable limitations on campaign expenditure may be justified where this is necessary to ensure that the free choice of voters is not undermined or the democratic process distorted by the disproportionate expenditure on behalf of any candidate or party.”

⁶³ In the first quarter of 2024, parties [declared](#) cash donations of GBP 18 million, of which GBP 9.2 million from companies and GBP 7.9 million by individuals. In 2023, parties [declared](#) GBP 93 million, while in 2021 and 2022 they [received](#) yearly GBP 51 million, including through donations and public funds.

⁶⁴ The [mechanism](#) for policy development grants aims to support political parties develop policies to include in their election manifestos and can reach at most GBP 2 million per year. Further funding is also provided through the “[Short Money](#)” scheme provided by the House of Commons and “[Cranborne Money](#)”, provided by the House of Lords to opposition parties to assist them in carrying out their parliamentary activity. Dedicated schemes are available for opposition parties in the Scottish Parliament and Northern Ireland Assembly.

⁶⁵ Article 3.b.II of the Council of Europe’s Committee of Ministers [Recommendation Rec\(2003\)4](#) stipulates that the states should “consider the possibility of introducing rules limiting the value of donations to political parties”. In 2024, the Committee on Standards in Public Life (CSPL), the EC and CSOs [recommended](#), among other things, that the corporate donations should not exceed companies’ profits in the UK within the preceding two years. See also paragraph 232 of the [2020 ODIHR and Venice Commission Guidelines on Political Party Regulation](#) which states that “legislation should attempt to create a balance between public and private contributions as sources of funding for political parties.”

⁶⁶ Contributions under GBP 500 are not considered to be donations and therefore permissibility checks regarding the status of the giver are not required.

⁶⁷ Permissibility checks are done by recipients withing 30 days of receipt. The EC [guidelines](#) state that parties should monitor if some donors would attempt to avoid permissibility checks by making serial donations under the threshold. Several ODIHR EAM interlocutors pointed out that the strategy of small repeated untransparent donations was used during the Brexit referendum. Article 3 of the Council of Europe’s Committee of Ministers [Recommendation Rec\(2003\)4](#) states that the “measures taken by states governing donations to political parties should provide specific rules to ensure transparency of donations and avoid secret donations.” See also paragraphs 211-213 of the 2020 ODIHR and Venice Commission [Guidelines on Political Party Regulation](#).

procedures, and some ODIHR EAM interlocutors expressed concerns regarding insufficient permissibility checks.⁶⁸ Donations may come from companies registered and ‘carrying on business’ in the UK; however, they may be subsidiaries of foreign companies, which could lead to the undetected funnelling of campaign funds from sources abroad. The potential for foreign influence has been underlined in official reports and by several ODIHR EAM interlocutors.⁶⁹ No regulations are in place to require payments over a certain threshold to be made through bank transfers.⁷⁰

Consideration could be given to lowering the limit for permissibility checks to donations and requiring donations above a certain low threshold to be made through bank transfers.

Political parties may receive donations from unincorporated associations (UAs), which are comprised of two or more individuals with common interests, a type of association that most ODIHR EAM interlocutors identified as a means of circumventing funding transparency. UAs are only required to register with the EC if they make political contributions to parties, third parties, or holders of certain elective offices, members of political parties, or members of associations exceeding GBP 37,270 per year, excluding contributions to candidates.⁷¹ The donations to UAs are not subject to permissibility rules, although they may make donations to political parties and candidates themselves, which reduces transparency.

To increase transparency, permissibility requirements should be imposed on unincorporated associations, as well as a more transparent reporting regime concerning their political financial activities.

B. CAMPAIGN EXPENDITURE

There are two possibilities for regulated periods for candidates’ campaigns: a “long” and a “short” campaign.⁷² In 2024, only the latter applied. Candidates can spend up to GBP 11,390 per constituency and 8 or 12 pence per registered voter in the borough or county, respectively. Political parties can opt to spend in the regulated period of one year before election day either a predefined amount or an amount based on the number of contested seats.⁷³ Some ODIHR EAM interlocutors expressed concerns that the line between party (national) campaign and candidate (local campaign) expenditure is not always clear,

⁶⁸ The [EC](#) and the Committee on Standards in Public Life ([CSPL](#)) recommended the introduction of anti-money laundering style verifications on donations and loans. In 2023, the government [rejected](#) an amendment to the National Security Bill, which would impose verification requirements on donations to political parties to ensure that they are not disguised payments from foreign powers.

⁶⁹ The 2020 Intelligence and Security Committee of Parliament [report](#) noted that members of the Russian elite were “involved with charitable and/or political organisations in the UK, having donated to political parties”. See the 2023 [briefing](#) on foreign interference by Spotlight on Corruption.

⁷⁰ The CPSL recommended imposing bank payments for donations of GBP 500 and above. Paragraph 258 of the 2020 ODIHR and Venice Commission [Guidelines on Political Party Regulation](#) states that to “avoid undue influence from unknown sources is to state in relevant legislation that donations above a certain (low) amount shall be made through bank transfer, bank check or bank credit card, to ensure their traceability in terms of amount and sources.”

⁷¹ Once registered, the UAs [must submit](#) several reports, including on each gift over GBP 11,180. In [July 2024](#),²⁴ UAs were registered. According to Transparency International, since 2010, UAs [made political donations](#) of some GBP 46 million, while they “only reported receiving a total of GBP 27,500 in political gifts – leaving a substantial gap between UAs’ declared income and their outgoing political donations.”

⁷² The long campaign begins once 55 months have passed in the current convocation of parliament, while the short campaign begins after the parliament is dissolved and ends on election day.

⁷³ Fixed value for England is GBP 1,458,440, for Scotland GBP 216,060 and for Wales GBP 108,030. The alternative option is GBP 54,010 multiplied by the number of constituencies being contested – totalling up to GBP 34 million in the UK. As defined by the law, the expenses may be political party broadcasts, unsolicited material sent to voters, market research, press conferences, rallies and events or transportation related to party promotion. The regulated period started on 6 July 2023 and ended on 4 July 2024.

and parties tend to provide more support to candidates in some constituencies.⁷⁴ The unforeseeable campaign period, stemming from the lack of a fixed starting point in combination with a complex timeline and spending system, introduces a level of uncertainty and reduces the transparency of spending.⁷⁵

To ensure transparency and predictability of record-keeping and reporting, consideration could be given to establishing a clear timeline for election campaigns and reporting obligations.

During the regulated period of one year preceding election day, third parties who want to spend more than GBP 10,000 must register with the Electoral Commission.⁷⁶ Third parties must report expenditures if they spend more than GBP 10,000 in Northern Ireland, Scotland and Wales and GBP 20,000 in England. Since 2022, the regulations on donations and spending only apply to third parties that spend more than GBP 700.⁷⁷ Some ODIHR EAM interlocutors stated that the regulations are restrictive and complex and can deter participation in the political discourse. They also remarked that reporting procedures can be burdensome, taking into consideration the limited capacity of some of the third parties.⁷⁸

C. REPORTING AND OVERSIGHT

Political parties are required to submit weekly reports to the EC during the short campaign period and quarterly reports, which include single or cumulative donations or loans from the same source above GBP 11,180 within a calendar year.⁷⁹ Registered third parties that meet the reporting thresholds submit quarterly and weekly reports, respectively, including donations exceeding GBP 7,500. Several ODIHR EAM interlocutors raised the issue of the increased high level of reporting thresholds for donations.⁸⁰ There is no interim report in place for candidates, which reduces transparency. Political parties are also required to submit annual statements of accounts to the EC, which are, however, not verified by the EC.⁸¹ The data is available on the EC's online platform, and although the law does not prescribe a deadline for their publication, the Commission aims to make it public within a reasonable timeframe.

Candidates are required to submit reports to ROs or AROs on expenditures and donations exceeding GBP 50 no later than 35 days after the announcement of the results. Failure to submit the reports results in criminal sanctions. These are available for public scrutiny for two years; however, the law does not

⁷⁴ Several ODIHR EAM interlocutors referred to a practice of parties distributing propaganda materials without a specific candidate's name in a certain constituency to support a candidate. This expenditure can be counted for the party and not for the candidate, which could lead to circumventing the rules.

⁷⁵ Paragraph 246 of the 2020 ODIHR and the Venice Commission [Guidelines on Political Party Regulation](#) iterates that "All systems for financial allocation and reporting, both during and outside of official campaign periods, should be designed to ensure transparency".

⁷⁶ These are the individuals or organizations that campaign for or against political parties or candidates, or on issues around elections, but are not standing. To spend more than GBP 700, they must be an individual or company registered in the UK or an unincorporated association with the requisite UK connection; the latter [cannot spend](#) more than GBP 10,000. Before the elections, there were [65 registered third parties](#), of which 15 were subject to reporting limits.

⁷⁷ They can spend a total of GBP 762,130 in the UK, GBP 17,553 in a constituency or GBP 700 in a local campaign against or in favour of a candidate. In the 2015 elections, the expenditure of third parties accounted for 4.8 per cent of the total expenditure, while in 2010, it was some 9 per cent.

⁷⁸ As regulated by the Elections Act, in 2023, the EC produced a [Code of Practice](#) on the laws relating to third-party spending, which applies to the elections for the UK Parliament and the Northern Ireland Assembly and has been approved by the Parliament.

⁷⁹ The reporting threshold for local branches is GBP 2,230. For these elections parties received donations of almost GBP 15 million, out of which 9.5 million was declared by the Labour Party.

⁸⁰ Article 7.3 of the 2003 UN [Convention against Corruption](#) requires states to "enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties."

⁸¹ Submission deadlines are between 4 and 6 months and also depend on the party's chosen financial year-end.

require the ROs and AROs to publish the reports online, and some ODIHR EAM interlocutors pointed to the difficulty of accessing the documents.⁸² The EC publishes a summary on its website, even though it is not legally required. Parties are required to submit expenditure reports to the EC within three months of the election day if the total amount is less than GBP 250,000 or within six months if it exceeds this amount. Similar deadlines apply to third parties that have spent more than the reporting threshold.⁸³ Reporting categories are defined by law; some ODIHR EAM interlocutors suggested that online advertising should be reported separately for greater transparency.⁸⁴ While the EC encourages electronic submissions, reports may still be provided in paper form, which could reduce the efficiency of oversight.

In order to increase transparency of reporting, the law could be amended to require the Electoral Commission to publish online all campaign finance disclosures in a user-friendly format.

The EC is mandated to monitor campaign finance, perform investigations, and has the power to impose civil penalties for certain offences or other breaches of the rules.⁸⁵ It does not verify the permissibility of donations from weekly reports but controls samples of donations reported as accepted or returned within the relevant quarterly report of political parties or in the post-election report for third parties. The EC can apply fines of up to GBP 20,000, and all ODIHR EAM interlocutors pointed out that these sanctions are too low to be effective in deterring violations.⁸⁶

The 2022 Elections Act abolished the right of the EC to bring criminal proceedings to court, but it can still refer cases for police investigation and prosecution.⁸⁷ By law, breaches of the law by candidates are not investigated by the EC but by the police. Some ODIHR EAM interlocutors pointed to the limited capacity and expertise of the law enforcement agencies to initiate campaign finance investigations. Overall, the oversight system lacks strength and clarity, and there is a need for an efficient and dissuasive sanctioning regime.⁸⁸

Consideration could be given to extending the oversight, investigative and sanctioning powers of the EC and providing it with the necessary resources for enforcement, including with regard to candidates.

⁸² See paragraph 259 of the 2020 ODIHR and Venice Commission [Guidelines on Political Party Regulation](#) which states that “In an effort to support transparency and provide civil society and other interested stakeholders with the possibility of reviewing parties’ campaign finances, it is good practice for such financial reports to be made available on publicly available resources in a coherent, comprehensive and timely manner over an extended period of time.”

⁸³ Reports for campaign expenditures over GBP 250,000 must include an independent auditor’s report. Reports are required to contain invoices for expenditures over GBP 200.

⁸⁴ According to [WhoTargetsMe](#), during the campaign, parties, candidates and third parties spent through Facebook Ads and Instagram some GBP 8.5 million and GBP 2.7 million through Google and YouTube. Labour spent GBP 6.1 million, Conservatives spent GBP 2.1 million, Reform UK GBP 750 thousand, Liberal Democrats GBP 450 thousand and the Green Party some GBP 300 thousand.

⁸⁵ The EC follows media or other sources and if it discovers any breaches of campaign finance rules, it can issue guidance, a non-compliance warning or a referral for formal investigation. Information about investigations and sanctions is published monthly on the EC website. The EC’s latest [Enforcement Policy](#) entered into force on 1 September 2023.

⁸⁶ The EC [performed](#) 34 investigations in 2022/23 compared to 42 in the previous year. Over the year, 20 penalties were imposed across seven cases, totalling to GBP 16,130. In comparison, 11 sanctions were applied in 2021/22 and 33 in 2020/21. No disclosure or investigation notices were issued in 2022/23

⁸⁷ According to the EC [statement](#), no prosecutions have been brought forward by the police or the CPS from 2000 to 2020.

⁸⁸ Article 16 of the CoE Committee of Ministers [Recommendation Rec\(2003\)4](#) highlights that “[s]tates should require the infringement of rules concerning the funding of political parties and electoral campaigns to be subject to effective, proportionate and dissuasive sanctions.” Paragraph 268 of the 2020 ODIHR and Venice Commission [Guidelines on Political Party Regulation](#) states that “legislation should grant oversight agencies the ability to investigate and pursue potential violations. Without investigative powers, agencies are unlikely to have the ability to effectively implement their mandate.”

To ensure the efficiency of the oversight process, an effective, proportional and dissuasive sanctioning regime could be imposed.

X. PARTICIPATION OF PERSONS WITH DISABILITIES

The Elections Act extended the requirement for ROs and AROs to support persons with disabilities to vote by providing a wide range of aids and adaptations at the polling stations.⁸⁹ The act also expanded the range of persons whom voters with disabilities can choose for assistance. The EC informed the ODIHR EAM that it has been working closely with disability organisations and other relevant stakeholders since 2022 to raise awareness about the amendments.⁹⁰

Organisations representing persons with disabilities played a key role in facilitating their electoral rights, thereby contributing to accessibility and inclusiveness.⁹¹ While the ODIHR EAM interlocutors were generally positive about the recent legal changes, some stated that the government does not sufficiently promote the participation of persons with disabilities and that political parties should make their platforms and campaigns more accessible and also nominate candidates with disabilities.⁹² Some organisations representing persons with disabilities requested the government to reinstate the Access to Elected Office Fund, also known as the EnAble Fund for Elected Office, which was discontinued in 2020, as this fund was crucial in enabling candidates with disabilities to compete on equal terms with others by covering additional costs related to their disabilities.⁹³

Consideration should be given to increasing the engagement of the government and political parties in promoting the electoral rights of persons with disabilities and ensuring that election information and awareness campaigns are fully inclusive and target all segments of the population, in particular those that are marginalized or disadvantaged.

XI. MEDIA

The UK media landscape is shaped by a strong tradition of public service broadcasting and a historically partisan yet pluralistic and vibrant press.⁹⁴ An overall robust media landscape, including investigative

⁸⁹ The EC [guidance](#) was updated after the introduction of the 2022 Elections Act comprising among others, the magnifiers, tactile voting device, languages other than English or Welsh, *Braille*, symbolic (picture) and audio formats, wheelchair accessible booths, badges identifying polling station staff, pencil grip, ramps, appropriate lighting and parking spaces reserved for voters with disabilities.

⁹⁰ The EC also published [guidance](#) for ROs and AROs on implementing the changes.

⁹¹ For instance, the Royal Society for Mentally Handicapped Children and Adults (MENCAP) as part of its "[My Vote My Voice](#)" campaign for the 2024 general election, produced videos to guide polling station staff on enabling voters with disabilities to vote independently, in secret, and with ease. These [videos](#) featured insights from disabled voters on accessible voting measures. The British Deaf Association (BDA) [created](#) sign language videos with subtitles detailing key election dates and procedures for the Deaf community across the UK. Similarly, the Royal National Institute of Blind People (RNIBP) [urged](#) blind and partially sighted voters to request reasonable voting adjustments from local electoral authorities. RNIBP also provided [resources](#) for election administrators to support these voters effectively. Finally, Scope, a disability equality charitable organization, developed [guidance](#) for candidates on running inclusive and accessible campaigns, informed by persons with disabilities.

⁹² See the 2023 Recommendations on the Rights of Persons with Disabilities to Participate in Political and Public Life in the OSCE Region ([Dublin Recommendations](#)) which, *inter alia*, invites the participating States to promote the comprehensive engagement of persons with disabilities throughout the electoral cycle and cross all election processes, including voter education, voter registration, campaigning, voting, election observation and results tabulation, post-election assessment and election reform processes.

⁹³ Despite calls from various organizations and a cross-party group of MPs for its re-establishment, the UK government [has yet to reintroduce](#) the fund. A similar fund exists in [Scotland](#) and [Wales](#).

⁹⁴ In the run-up to elections, a number of newspapers endorsed one of the two major political parties.

journalism that focuses on political and electoral campaign finance, significantly contributes to the oversight of political and economic power and institutions.⁹⁵ However, news consumption and general trust in the news have declined over the last few years. The British Broadcasting Corporation (BBC) has the strongest news outreach through television, radio and the internet and retains a high level of trust.⁹⁶

The migration of advertising revenue from traditional media to digital services and the reduction of advertising budgets has resulted in limiting the plurality of the available news coverage, in particular at the local level.⁹⁷ Furthermore, several ODIHR EAM interlocutors identified the concentration of media ownership as an issue, with a few companies dominating the national market, potentially impacting the plurality and diversity of the news.⁹⁸ The communications services regulator, the Office for Communications (OFCOM), has a statutory duty to maintain a “sufficient plurality” of broadcasting providers and reviews the operation of media ownership rules every three years, including on mergers, set out in the 2003 Communications Act.⁹⁹ Following plans to sell the newspapers *Daily* and *Sunday Telegraph* and the *Spectator* magazine to a consortium backed by the United Arab Emirates, amendments to the 2002 Enterprise Act on “mergers involving newspaper enterprises and foreign powers” came to power on 24 May 2024. As a result, the acquisition was blocked.¹⁰⁰

The National Committee for Safety of Journalists launched its National Action Plan in 2021, which aims to address the growing number of threats against journalists, including online.¹⁰¹ In addition, online violence against women journalists has risen in recent years, with a significant number of women considering leaving the profession.¹⁰²

According to the ODIHR EAM interlocutors, there is a growing number of legal intimidation and litigations against journalists and media aimed at silencing critical voices. Strategic lawsuits against public participation (SLAPPs) have been identified as a serious issue in the UK due to its disproportionately high legal costs for defending cases and the rule that a defendant must pay the

⁹⁵ NGOs, including the [Bureau of Investigative Journalism](#) and the [Centre for Investigative Journalism](#), provide training on investigative journalism and, along with major media outlets, publish investigations in the public interest.

⁹⁶ According to the [Reuters Institute](#), the BBC leads the weekly use in TV and radio news consumption, followed by the public ITV News and the commercial Sky News. Online news consumption is led by the BBC, followed by the Guardian Newspaper and Sky News.

⁹⁷ According to the 2023 report by the [Media Reform Coalition](#), 71 per cent of local newspapers are owned by just six companies. Furthermore, the Public [Interest News Foundation](#) (PINF), in its [2024 Index](#), identified a 30 per cent decrease in revenue of independent news publishers compared to the previous year. The PINF launched a [Local News Commission](#), supported by the government, with a mission to come up with a list of policy recommendations on local news.

⁹⁸ According to the [Media Reform Coalition](#), three companies, DMG Media (publishers of the Daily Mail, Metro and i), News UK (the Sun and The Times) and Reach (Daily Mirror, Daily Express, Daily Star) dominate 90 per cent of national newspaper circulation. In addition, these three companies account for more than 40 per cent of the total audience reach of the top 50 online news brands.

⁹⁹ See the 2024 OFCOM's [recommendations](#), which followed the last such review.

¹⁰⁰ The open consultation between the Department for Culture, Media and Sport and the relevant stakeholders closed on 9 July 2024.

¹⁰¹ The [National Action Plan for the Safety of Journalists](#) includes measures to enhance the criminal justice system response in tackling crimes against journalists, support journalists and their employers to build the resources they need to protect personal safety and help online platforms to tackle the wider issue of abuse online.

¹⁰² According to [research](#) conducted by *Women in Journalism* and *Reach*, three-quarters of women working in the UK journalism and media industries had experienced rape or death threats, harassment, stalking, misogyny or comments of sexual nature online in connection to their work. See also an [open letter](#) by over a 100 media professionals to the police and the National Committee for the Safety of Journalists.

claimant's legal costs if the case was lost, which is contrary to international standards.¹⁰³ Freelance journalists and financially less sustainable local media are particularly vulnerable to SLAPPs, which stifles investigative journalism on the national and local levels.¹⁰⁴ The National Committee for Safety of Journalists established a SLAPP taskforce at the end of 2023 to co-ordinate a non-legislative response, complementing an amendment to the Economic Crime and Corporate Transparency Act aimed at addressing SLAPPs linked to economic crime.¹⁰⁵ According to ODIHR EAM interlocutors, the law has not been tested yet, and nevertheless, media NGOs campaign for a stand-alone act, which *inter alia* would enable courts to swiftly dispose of cases recognized as SLAPPs, provide for penalties that are sufficient to deter the use of SLAPPs, and protective measures for SLAPP victims.¹⁰⁶ Media lawyers highlight the need for a fair and accessible justice system and lower costs of litigation.

Most major newspapers with national coverage have shifted to an online subscription model. ODIHR EAM interlocutors noted that the competition for online views has increased the pressure to produce news immediately, which could negatively impact the quality of provided information and has changed the quality of headlines, which often contain 'catchy' phrases or contain names of politicians that are not directly referred to in the article. The ODIHR EAM interlocutors also reported that access to political actors has decreased as they increasingly use social networks to communicate with the public.

The 2003 Communications Act established OFCOM as the regulatory authority for both commercial and public service broadcasters. In line with the law, OFCOM oversees broadcasters' compliance with the law and produces a Broadcasting Code, which includes the rules on impartiality and accuracy in news, as well as guidance on their implementation. The BBC, which has been overseen by OFCOM since 2017, sets out its own guidelines on due impartiality and issues election guidelines for each election.¹⁰⁷

A complaints framework aimed at ensuring compliance with statutory requirements provides that the complaints related to the BBC are addressed with the BBC first, while the complaints about other broadcasters need to be addressed with OFCOM. ODIHR EAM interlocutors informed that both BBC and OFCOM received a high number of complaints. According to the ODIHR EAM interlocutors, the implementation of due impartiality is based on institutional culture and general compliance by stakeholders. Content requirements must be balanced by plurality to maintain trust in the media.¹⁰⁸

In October 2023, Parliament passed the Online Safety Act, which obliges online services to take measures against online harm, with OFCOM as the relevant regulator. However, OFCOM has advised that its full powers under the act are not in force for these elections, and services were not at the time

¹⁰³ See paragraph 47 of the 2011 [General Comment 34](#) to the ICCPR, which stipulates that "States parties should place reasonable limits on the requirement for a defendant to reimburse the expenses of the successful party", referring in particular to the [Concluding observations](#) of the CCPR Human Rights Committee on the United Kingdom of Great Britain and Northern Ireland. Furthermore, while in the UK, the defendant bears the burden of proving the truthfulness of a statement, the 2000 [Joint Declaration](#) by the UN Special Rapporteur on Freedom of Opinion and Expression, the OSCE Representative on Freedom of the Media and the OAS Special Rapporteur on Freedom of Expression stipulates, that "the plaintiff should bear the burden of proving the falsity of any statements of fact on matters of public concern". See also the CoE Committee of Ministers [recommendation Rec\(2024\)2](#) on countering the use of strategic lawsuits against public participation (SLAPPs).

¹⁰⁴ See [UK Anti-SLAPP Coalition](#) and [the Bureau of Investigative Journalism](#).

¹⁰⁵ See the [UK Government SLAPPs Taskforce](#).

¹⁰⁶ See the [Model Anti-SLAPP Law](#) by the Anti-SLAPP Coalition.

¹⁰⁷ See the BBC's [General Election Guidelines 2024](#).

¹⁰⁸ In May 2024, OFCOM concluded that *GB News* was in a serious and repeated breach of due impartiality rules and [imposed](#) a statutory sanction. However, following a High Court ruling on 28 February 2025 that set aside two OFCOM breach decisions involving programmes hosted on *GB News* and returned them for reconsideration, OFCOM [chose](#) not to reinvestigate the cases. It also withdrew three other breach findings and one not pursued decision, removing all of these from *GB News*'s compliance record and discontinuing six related investigations.

of the elections required to take measures under the act.¹⁰⁹ Media NGOs criticized, among other things, the potential of the act to undermine privacy rights by compromising end-to-end encryption.¹¹⁰

Existing legislative and policy frameworks to counter strategic lawsuits against public participation (SLAPPs) should be further strengthened, particularly regarding structural and procedural safeguards and remedies, support for targets and victims, and the development of education, training, and awareness-raising programmes.

The election campaign was extensively covered in broadcast, print and online media. The OFCOM Broadcasting Code and the BBC Election Guidelines required the media to consider parties' past and current electoral support when covering political parties and candidates. In general, the broadcasters, including the BBC, were criticised for giving non-parliamentary parties too much airtime.¹¹¹ According to ODIHR EAM interlocutors, the major electoral debates attracted high audience share rates, resulting in a spike in complaints to both the BBC and OFCOM. The BBC hosted a "seven-party debate" on 7 June and a "Question Time leaders' special" on 20 June. A head-to-head leaders' debate with Rishi Sunak and Keir Starmer was held on 26 June. Additional debates were held in Scotland, Northern Ireland, and Wales, as well as at the local level.

XII. ELECTION OBSERVATION

The law allows natural and legal persons to be accredited as international or domestic observers who have the same rights. According to the Code of Conduct for observers, observer activities are largely limited to election day activities, specifically the issuance and receipt of postal ballots, voting in polling stations, and the verification and counting of votes at counting centres.¹¹² However, the law does not explicitly provide for the observation of other key election procedures, for example, voter registration and nomination and registration of candidates, which is at odds with international good practice.¹¹³

In line with international good practice, the electoral legislation should explicitly allow for citizen and international observation of all aspects of the electoral process.

The EC maintains a list of approximately 2,000 observers, including both citizen and international observers, many of whom applied specifically to observe these elections.¹¹⁴ Democracy Volunteers, the largest domestic observation group, announced that it had deployed around 200 observers across the country.¹¹⁵

¹⁰⁹ As an example, a new [foreign interference offence](#) in the Act and related duties on services relating to this and other illegal harms will only [come into effect in 2025](#), as well as OFCOM's related powers under the Act.

¹¹⁰ According to the [criticism](#) by civil society, under the Act, OFCOM can require companies to scan users' messages to make sure that they aren't transmitting illegal material; however, this is not possible to do without removing the end-to-end encryption used by direct messaging platforms such as WhatsApp and Signal. OFCOM explained to the ODIHR EAM that such encryption is a feature that service providers should consider as part of their own risk assessments, to the extent it may increase the risks of harm identified or their ability to mitigate such risks.

¹¹¹ [Section 6](#) of the OFCOM Broadcasting Code defines the impartiality requirement during elections and referendums. The BBC [informed](#) the public that they include public opinion polls when determining the coverage of a non-parliamentary party or candidate.

¹¹² See the Electoral Commission's [Code of conduct for observers](#).

¹¹³ Paragraphs II.3.2.a-b of the 2002 Venice Commission's [Code of Good Practice in Electoral Matters](#) stipulate that "observers should be given the widest possible opportunity to participate in an election observation exercise" and that "observation must not be confined to the election day itself [...]. It must make it possible to determine whether irregularities occurred before, during or after the elections."

¹¹⁴ See EC's [Register of accredited electoral observers](#).

¹¹⁵ See Democracy Volunteers' [Final Report](#) on 2024 General Election.

XIII. ELECTION DISPUTE RESOLUTION

The legal framework for election dispute resolution provides legal remedies but unduly limits the accessibility of these remedies. According to the RPA and the Election Petition Rules, the result of an election can be challenged by a registered voter or a candidate within 21 days of the announcement of the results in the constituency.¹¹⁶ Political parties and other election stakeholders are not eligible to file complaints directly.¹¹⁷ These petitions are heard by an election court composed of two senior judges in the relevant constituency.¹¹⁸ The court may decide to recount the votes or perform scrutiny, and criminal investigations may take place at the same time as the decision on the petition.¹¹⁹ Following the general election, no formal petitions were submitted challenging the election results.

Complainants are required to pay petition filing fees and, in addition, security for costs aimed at safeguarding against potential legal costs, which for a parliamentary election is GBP 5,000 and typically refundable only in case of winning the case.¹²⁰ This unduly limits access to legal remedies. Some ODIHR EAM interlocutors stated that the cost could deter potential complainants from seeking a remedy. All complaints are investigated on merit, and there is no mechanism to dismiss unfounded complaints. Trials can last up to several weeks and result in untimely decisions that impact the effectiveness of the remedy.¹²¹ There is no possibility to appeal cases further.¹²² The number of complaints is usually very low, and no complaints were lodged related to these elections.¹²³ Overall, despite some restrictions, all ODIHR EAM interlocutors expressed trust in electoral dispute resolution.

To ensure the accessibility of legal remedies, consideration should be given to removing or minimizing the costs associated with filing a complaint. Consideration could also be given to extending legal standing to all electoral stakeholders.

The EC receives complaints regarding its activity within an internal two-layer review system, with a deadline for resolution of 20 days for each stage, and further appeals can be submitted to the Parliamentary and Health Ombudsman. Complaints on electoral irregularities during the voting process can be lodged with the Ros or AROs. Complaints regarding voter registration are filed with the ERO

¹¹⁶ The deadline can be extended to 28 days by application in case of alleged corrupt or illegal practice, such as pressure, intimidation or vote-buying. If a candidate or agent is found guilty of an illegal or corrupt practice, they are disbarred from holding elective positions for 3 or five years and the current election is voided. Petitions can be submitted including for ineligibility of a candidate or misconduct of election officials.

¹¹⁷ Paragraph B.2.a. of the Council of Europe [Recommendation Rec\(2004\)20](#) of the Committee of Ministers to member states on judicial review of administrative acts states that the "[j]udicial review should be available at least to natural and legal persons in respect of administrative acts that directly affect their rights or interests. Member states are encouraged to examine whether access to judicial review should not also be opened to associations or other persons and bodies empowered to protect collective or community interests."

¹¹⁸ The jurisdiction within the UK is divided between the High Court, Scotland's Court of Session, or the High Court of Northern Ireland. In its "Electoral Law: Final Report" the [Law Commission recommended](#) the transposition to the system of ordinary courts, with one point of appeal.

¹¹⁹ If candidates or agents are found guilty of an illegal or corrupt practice, they are disbarred from holding elective positions for three or five years, respectively, and the current election is voided.

¹²⁰ In addition, a fee of GBP 626 for issuing a petition and GBP 119 for the application are required. Additional costs can be incurred for barristers. A judge can decide to reconsider the total costs.

¹²¹ Section II.3.3 of the 2002 [Venice Commission Code of Good Practice in Electoral Matters](#) states that appeal bodies should have the power to annul elections if irregularities could have influenced the outcome. It further emphasizes that the complaint procedure should be straightforward, not overly formalistic, and subject to short deadlines both for filing and for adjudication.

¹²² Judicial review for legal errors can be initiated. According to the [parliamentary procedure](#) related to the RPA, a special case may be invoked "when required, by the High Court itself. Such special cases usually involve the determination of points of law and may be analogous to appeals, although the scope of the power is not clear"

¹²³ Between 2005 and 2019, nine petitions were brought to court, and one petition was successful in 2010.

and appealed in at most 14 days at the county court. Candidate registrations or rejections can be contested before ROs and AROs up to 19 working days before the election day (7 June) or 18 days if a candidate is convicted to serve a prison sentence of a year or more. The decisions of the ROs and AROs on validated nominations cannot be appealed in court before the election day. The candidature can be subject to an election petition after the election.¹²⁴ Complaints about electoral offences can be made to the police, and each of the 43 local police forces includes an Election Single Point of Contact with trained officers who can provide direction for the investigation of cases and who receive further guidance from the EC.¹²⁵ The lengthy deadlines for submission and consideration of these cases limit the effectiveness of the remedy and are not in line with international good practice.¹²⁶

In line with international standards, consideration should be given to providing for the timely review of election-related disputes, including those related to the nomination of candidates, to ensure these matters are resolved before election day.

In 2022, a new penalty was introduced for those found guilty of intimidating candidates, campaigners or elected representatives, which could result in a five-year ban from holding office. Other changes were made to simplify and clarify the offence of undue influence and to better define types of unlawful conduct intended to influence the voting. The 2023 Ballot Secrecy Act introduced a criminal offence in the election law for anyone accompanying a voter to a polling place or being in the vicinity of a voter inside a polling station for the purpose of influencing the voters on their choice.¹²⁷

XIV. ELECTION DAY

In line with ODIHR methodology, the ODIHR EAM did not observe election day in a systematic and comprehensive manner but did visit a limited number of polling stations in some constituencies of the Greater London area, as well as in Berkshire and Surrey and also visited a counting centre in London.

Elections were held in over 40,000 polling stations across the UK between 7 am and 10 pm. For these elections, the EC issued guidance to limit the number of voters per polling station to 2,250 to ensure a smooth process, having the additional demands introduced by the 2022 Elections Act.

The voting process in polling stations visited by the ODIHR EAM was orderly, and procedures were respected. A requirement for voters to show a photo ID was followed. The ODIHR EAM observers were informed by the presiding officers that very few voters were turned away for not presenting proper photo ID, some of whom later returned with a photo ID.

According to presiding officers with whom the ODIHR EAM met, the new requirement for a voter to fill out a form for each postal vote they bring to a polling station is seen as burdensome and unnecessary, given the security measures in place when applying for such an option. Each polling station was provided with tendered ballot papers to be issued in the event that a voter's name was already marked on the register. At the time of voting, ballot papers are torn from ballot booklets, and the ballot papers

¹²⁴ Objections raised regarding nominations [must be solved](#), without further investigation, by the RO “as soon as practicable after it is made and in any event within 24 hours after the close of nominations”. Paragraph II.3.3.f. of the 2002 Venice Commission Code of Good Practice in Electoral Matters indicates that “All candidates and all voters registered in the constituency concerned must be entitled to appeal.”

¹²⁵ According to the Electoral Commission [electoral fraud page](#) there was no evidence of large-scale fraud in recent elections. Of the 1,462 alleged cases of electoral fraud received by police since 2019, 11 led to convictions.

¹²⁶ Guideline II.3.3.g of the Code of Good Practice provides that “time-limits for lodging and deciding on appeals must be short (three to five days for each at first instance)”.

¹²⁷ Any person found guilty of breaching the secrecy requirements can face a fine or imprisonment of up to six months or both. In England and Wales, the fine is unlimited; in Scotland and Northern Ireland, it is up to GBP 5,000.

and their corresponding counterfoils share the same serial numbers. When ballots are handed to voters, the voters' numbers from the electoral register are recorded on the counterfoils. This aims to enable courts to establish who voted for whom with the intent to support investigations of impersonation or fraud. Safeguards are in place to ensure safekeeping against misuse, and the counterfoils are destroyed a year after the elections; however, a possibility exists of a breach of secrecy of the vote and tracing back the voters' intents is of questionable value even in the case of an investigation due to suspected malfeasance.

To strengthen the integrity of voting procedures, consideration should be given to adding the requirement for voters to sign the voters' list before receiving a ballot paper and, at the same time, abandoning the use of serial numbers on ballot papers.

The vote count was to start as soon as possible and continue uninterrupted throughout the night.¹²⁸ In the counting centre observed, procedures were followed, and votes were verified and counted consistently and efficiently. After the count, ROs and AROs announced the results for their constituencies, usually in the presence of the candidates. In the absence of an official mechanism for publishing aggregate results for all 650 constituencies, the media played a key role in announcing the consolidated results. The first results were released shortly after 1 pm on 4 July, while the last official results were made public before midday on 5 July.¹²⁹

The civil society organizations played a significant role in the 2024 general election, engaging in various activities to promote democracy, support vulnerable groups, and advocate for electoral reforms.¹³⁰

XV. RECOMMENDATIONS

These recommendations, contained throughout the text, are offered to further enhance the conduct of elections in the United Kingdom and to support efforts to bring them fully in line with OSCE commitments, other international obligations, and standards for democratic elections.¹³¹ These recommendations should be read in conjunction with past ODIHR recommendations that the UK has yet to address. ODIHR stands ready to assist the authorities of the United Kingdom to further improve the electoral process and address the recommendations contained in this and previous reports.

A. PRIORITY RECOMMENDATIONS

¹²⁸ After the voting is over, the sealed ballot boxes, together with the completed evidence of the number of ballot papers issued to voters at the polling station, were to be taken to the counting centre in each constituency. If counting did not start within four hours after the close of the poll, acting RO had to publish and to deliver to the EC a statement setting out the time when the count began, the steps taken to comply with the requirement, and the reasons why the count did not begin on time.

¹²⁹ In Inverness, Skye and West Ross-shire constituencies in Scotland, delays occurred due to discrepancies between the provisional and verified number of counted votes forcing for two recounts before the official results were declared on 6 July in the late afternoon.

¹³⁰ For example, the Electoral Reform Society focused on advocating for changes to the electoral system to ensure fairer representation, while SCOPE, MENCAP, BDA, and RNIBP supported citizens with disabilities. Democracy Club promoted voter engagement by providing accessible information on candidates and the voting process, making it easier for the public to participate in the democratic process. Democracy Volunteers observed the elections to assess if they were conducted fairly and transparently.

¹³¹ In Paragraph 25 of the [1999 OSCE Istanbul Document](#), OSCE participating States committed themselves "to follow up promptly the ODIHR's election assessment and recommendations". The follow-up of prior recommendations is assessed by the ODIHR EAM as follows: recommendation 1 from the final report of the 2015 general elections is fully implemented. Recommendation 9 from the final report of the 2015 general elections is partially implemented. See also the ODIHR [electoral recommendations database](#).

1. As previously recommended, consideration should be given to a comprehensive review of the legislation well in advance of the next elections to harmonize, clarify and update respective laws. To enhance gender equality and mainstream gender considerations in the legal system, gender-neutral language should be utilized in the drafting of the electoral legislation.
2. To ensure effective election preparations and minimize the risks of errors in implementing election procedures, the law should be amended to allow for adequate time between the dissolution of Parliament and election day.
3. To ensure the accuracy of voter registers and avoid multiple registrations, the authorities could consider introducing a UK-wide voter register or a voter information exchange system for use by Electoral Registration Officers. Voters should have an easy-to-use possibility to check their registration online.
4. Consideration could be given to lowering the limit for permissibility checks to donations and requiring donations above a certain low threshold to be made through bank transfers.
5. Consideration could be given to extending the oversight, investigative and sanctioning powers of the EC and providing it with the necessary resources for enforcement, including with regard to candidates. To ensure the efficiency of the oversight process, an effective, proportional and dissuasive sanctioning regime could be imposed.
6. Existing legislative and policy frameworks to counter strategic lawsuits against public participation (SLAPPs) should be further strengthened, particularly regarding structural and procedural safeguards and remedies, support for targets and victims, and the development of education, training, and awareness-raising programmes.
7. To ensure the accessibility of legal remedies, consideration should be given to removing or minimizing the costs associated with filing a complaint. Consideration could also be given to extending legal standing to all electoral stakeholders.

B. OTHER RECOMMENDATIONS

Legal framework and electoral system

8. Consideration could be given to introducing a mandatory parliamentary vote for the dissolution of parliament as a pre-condition for approving the calling of early elections.

Election administration

9. To promote gender equality and improve accessibility to gender-related data, information about the composition of the electoral administration should be made available in a comprehensive manner.
10. To maintain full public confidence in election administration, the authorities should review the need for the Strategy and Policy Statement for the Electoral Commission. In case this instrument is kept, its contents should be reviewed to exclude any negative impact on the commission's status as an independent body.

Voter Registration

11. The blanket deprivation of voting rights of citizens serving a prison sentence should be revised in line with international standards.
12. To facilitate equal participation of voters, election authorities could conduct a comprehensive survey to determine the impact of the photo ID requirement on different categories of voters, especially young voters, ethnic minorities, women, and transgender persons.
13. Consideration should be given to cancelling the use of proxy voting and exploring alternative voting methods which duly uphold the OSCE commitments and other international standards for democratic elections.

Candidate Registration

14. Legislative measures or other temporary special measures should be considered to promote the inclusion of women candidates. Political parties could consider ways to further increase gender balance.

Election Campaign

15. To enhance transparency and consistency in applying the rules for digital imprints on campaign materials, the election administration should develop and disseminate clear guidelines, including visual examples.

Campaign Finance

16. To ensure the transparency of campaign finance, consideration could be given to lowering the established reporting thresholds and setting expenditure upper limits to ensure a level playing field.
17. In line with international standards, consideration could be given to imposing an annual donation threshold for a permissible donor to prevent the undue influence of large contributors.
18. To increase transparency, permissibility requirements should be imposed on unincorporated associations, as well as a more transparent reporting regime concerning their political financial activities.
19. To ensure transparency and predictability of record-keeping and reporting, consideration could be given to establishing a clear timeline for election campaigns and reporting obligations.
20. In order to increase transparency of reporting, the law could be amended to require the Electoral Commission to publish online all campaign finance disclosures in a user-friendly format.

Participation of persons with disabilities

21. Consideration should be given to increasing the engagement of the government and political parties in promoting the electoral rights of persons with disabilities and ensuring that election information and awareness campaigns are fully inclusive and target all segments of the population, in particular those that are marginalized or disadvantaged.

Election Observation

22. In line with international good practice, the electoral legislation should explicitly allow for citizen and international observation of all aspects of the electoral process.

Election dispute resolution

23. In line with international standards, consideration should be given to providing for the timely review of election-related disputes, including those related to the nomination of candidates, to ensure these matters are resolved before election day.

Election day

24. To strengthen the integrity of voting procedures, consideration should be given to adding the requirement for voters to sign the voters' list before receiving a ballot paper and, at the same time, abandoning the use of serial numbers on ballot papers.

ANNEX: FINAL RESULTS¹³²

Registered voters: 48,214,128
Turnout: 60.0 per cent (decline of 7.5 per cent from the 2019 elections)

Contestants	Seats	Votes	Per cent of valid votes
Labour Party	412	9,704,655	33.7
Conservative Party	121	6,827,311	23.7
Liberal Democrat	72	3,519,199	12.2
Scottish National Party	9	724,758	2.5
Sinn Fein	7	210,891	0.7
Independent candidates	6	564,243	2.0
Reform UK	5	4,117,221	14.3
Democratic Unionist Party	5	172,058	0.6
Green	4	1,943,265	6.7
Plaid Cymru	4	194,811	0.7
Social Democratic & Labour Party	2	86,861	0.3
Alliance Party	1	117,191	0.4
Ulster Unionist Party	1	94,779	0.3
Traditional Unionist Party	1	48,685	0.2
Total	650		

263 women were elected to the House of Commons, or 40.5 per cent.

¹³²

[Results published by the BBC.](#)

ABOUT ODIHR

The Office for Democratic Institutions and Human Rights (OSCE/ODIHR) is the OSCE's principal institution to assist participating States "to ensure full respect for human rights and fundamental freedoms, to abide by the rule of law, to promote principles of democracy and (...) to build, strengthen and protect democratic institutions, as well as promote tolerance throughout society" (1992 Helsinki Summit Document). This is referred to as the OSCE human dimension.

The OSCE/ODIHR, based in Warsaw (Poland) was created as the Office for Free Elections at the 1990 Paris Summit and started operating in May 1991. One year later, the name of the Office was changed to reflect an expanded mandate to include human rights and democratization. Today it employs over 130 staff.

The OSCE/ODIHR is the lead agency in Europe in the field of **election observation**. Every year, it coordinates and organizes the deployment of thousands of observers to assess whether elections in the OSCE region are conducted in line with OSCE commitments, other international obligations and standards for democratic elections and with national legislation. Its unique methodology provides an in-depth insight into the electoral process in its entirety. Through assistance projects, the OSCE/ODIHR helps participating States to improve their electoral framework.

The Office's **democratization** activities include: rule of law, legislative support, democratic governance, migration and freedom of movement, and gender equality. The OSCE/ODIHR implements a number of targeted assistance programmes annually, seeking to develop democratic structures.

The OSCE/ODIHR also assists participating States' in fulfilling their obligations to promote and protect **human rights** and fundamental freedoms consistent with OSCE human dimension commitments. This is achieved by working with a variety of partners to foster collaboration, build capacity and provide expertise in thematic areas including human rights in the fight against terrorism, enhancing the human rights protection of trafficked persons, human rights education and training, human rights monitoring and reporting, and women's human rights and security.

Within the field of **tolerance** and **non-discrimination**, the OSCE/ODIHR provides support to the participating States in strengthening their response to hate crimes and incidents of racism, xenophobia, anti-Semitism and other forms of intolerance. The OSCE/ODIHR's activities related to tolerance and non-discrimination are focused on the following areas: legislation; law enforcement training; monitoring, reporting on, and following up on responses to hate-motivated crimes and incidents; as well as educational activities to promote tolerance, respect, and mutual understanding.

The OSCE/ODIHR provides advice to participating States on their policies on **Roma and Sinti**. It promotes capacity-building and networking among Roma and Sinti communities, and encourages the participation of Roma and Sinti representatives in policy-making bodies.

All OSCE/ODIHR activities are carried out in close co-ordination and co-operation with OSCE participating States, OSCE institutions and field operations, as well as with other international organizations.

More information is available on the ODIHR website (www.osce.org/odihr).