



ELECTORAL COMMISSION REPORT

JANUARY 2024

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FOREWORD

The Electoral Commission has over the past eighteen months, been considering the broad range of matters raised by Tynwald. We have sought feedback from those involved in elections and more broadly from the public and other interested groups and we have analysed their responses alongside the evidence from other sources referenced in this report.

In formulating this report to Tynwald, the Commission has kept three broad principles in mind.

- Accessibility** Those who wish to vote and who qualify should be enabled to vote. This principle has led us consider how we can make the process easier and how we can improve participation in the democratic process.
- Credibility** Elections should be fair and transparent. Compliance with international standards of best practice for elections and clear, documented processes builds trust in the Isle of Man's democracy for its citizens and internationally.
- Equality** Each vote in the Isle of Man should count equally. If equality is not maintained, then the effect is to weaken the voting power of some voters in comparison to others.

The Commission has stood by the principle of equality which Tynwald approved in 2011 that keeps constituencies within a maximum variance of +/- 15% of population within each constituency. We are mindful that this is only the second boundary review since Tynwald voted to move to the current model of twelve constituencies of two members. We recognise the importance of stability and continuity and have also borne in mind cost considerations.

We have sought to ensure that the Island remains in line with international standards whilst keeping the overall impact on communities to a minimum. Looking to the future, the Commission recognises that more significant change to constituency boundaries will be needed, especially if population growth meets the targets outlined in the Island Plan.

We have taken note of the Commonwealth Parliamentary Association (CPA) Benchmarks¹ as directed by Tynwald. In addition, in our examination of the broader areas identified by Tynwald, we have reviewed the relevant feedback contained in the report from the CPA British Islands and Mediterranean Region Election Observation Mission's observation of the Isle of Man General Election in 2021² (CPA BIMR) and noted their recommendations.

Our recommendations include changes proposed for the short term as well as a longer-term direction of travel. The Isle of Man has a proud parliamentary tradition of leading the way in democratic participation and the Commission hopes that this work supports the Island in its continuing development.

Sally Bolton, Chair

¹ <https://www.cpahq.org/media/10jkk2nh/recommended-benchmarks-for-democratic-legislatures-updated-2018-final-online-version-single.pdf>

² <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

RECOMMENDATIONS SUMMARY

The Commission makes the following recommendations that:

Recommendation 1

Tynwald affirm that the Island should continue to adhere to international standards by ensuring that each constituency is of approximately equal size by population, maintaining the maximum permitted departure from the average in any constituency at 15%.

Recommendation 2

Legislation be brought forward to enshrine in law the maximum permitted departure from the average constituency size as 15% of average population.

Recommendation 3

The existing twelve two-seat constituencies be retained unchanged save for the changes to the boundaries between the constituencies of Middle and Glenfaba & Peel and the constituencies of Ayre & Michael and Ramsey as shown on the maps in Appendices 5 and 6, the purpose of such changes being to restore equivalency to the constituencies of Glenfaba & Peel and Ramsey.

Recommendation 4

In the event of significant change to the population and its distribution, that an Electoral Commission be appointed after the 2026 General Election to carry out further review of the constituency boundaries.

Recommendation 5

A full accessibility audit be undertaken of every premises intended to be designated as a polling station to ensure that all venues are as accessible as possible. This should include parking with disabled spaces and access to bus routes. The Cabinet Office to publish details concerning the level of accessibility of all venues used for election purposes. At least one polling station in each constituency to be made fully accessible and publicised as such.

Recommendation 6

The Clerk of Tynwald be invited to put forward costed proposals for electoral awareness campaigns aimed in particular at new residents and people with English as a second language.

Recommendation 7

The Council of Ministers commission a feasibility study, to be submitted, on the potential introduction of on-line voting taking into account the advancement of technology that is now available and the technical and legal implications thereof including a cost benefit analysis.

In the meantime, all efforts should be taken to develop the technological building blocks that enable more automated elections, including the full digitisation of the Electoral Register and on-line registration.

Recommendation 8

Cooperation between the Cabinet Office, Local Authorities and Captains of the Parish be improved. While the statutory responsibility for organising pre-election meetings sits with the Returning Officer, this should be delegated to the Captains of the Parish or Local Authority with the agreement of the Cabinet Office, with the Cabinet Office meeting all reasonable expenses relating thereto.

Recommendation 9

Cost effective methods be considered to streamline the postal voting process particularly through the use of technology and to further promote postal voting while considering appropriate support for Deputy Returning Officers.

Recommendation 10

An appropriate number of Certifying Officers be appointed for cases where it is not reasonably practicable for a voter to make use of any other available voting options.

Recommendation 11

All key electoral processes be identified and comprehensively documented by the Returning Officer in a manual and training materials produced for the use of Deputy Returning Officers and election staff. Incentives should be explored to encourage Deputy Returning Officers and election staff to participate in training in advance of polling day.

Recommendation 12

The ability to allow voters to vote at any polling station within their constituency be implemented across all constituencies forthwith.

Recommendation 13

The process for making complaints about damage, defacement and removal of election materials and any other relevant matters be set out by the Returning Officer. Clear guidance should be available as to whom a complaint should be made and the actions that can be taken by the relevant authority.

INTRODUCTION

THE ELECTORAL COMMISSION AND ITS REMIT

1. Section 57 of the Elections (Keys and Local Authorities) Act 2020 provides that the Governor in Council must appoint an Electoral Commission within 12 months of the national election of 2021 and every second national election thereafter. The Electoral Commission, which consists of a person appointed to chair the Commission and at least three other members, must review the number and boundaries of constituencies, as well as considering such matters relating to elections as a resolution of Tynwald directs, and must issue a report to Tynwald no later than 18 months after its appointment.

2. At its sitting on 20 July 2022, Tynwald passed the following resolution:

“That in addition to reviewing the number and boundaries of constituencies (which will include the number of seats per constituency) the Electoral Commission must consider and produce a report to Tynwald on the following matters:

1. *Accessibility of elections to voters;*
2. *The organisation of Pre-Election Meetings;*
3. *Postal voting procedures;*
4. *Proxy voting procedures;*
5. *Ability to vote at any polling station across a constituency;*
6. *The feasibility of setting up one or more "All Island" Polling stations; and*
7. *Candidate campaign materials,*

and in doing so shall have due regard to the Commonwealth Parliamentary Association Benchmarks for Democratic Legislatures³ and to the potential costs of its recommendations.

3. During the Tynwald debate on the motion, a number of issues to be considered by the Electoral Commission were referred to which were later included in the Commission’s Terms of Reference⁴, the relevant extract of which is included in Appendix 1

4. On the 22 September 2022 the Governor in Council appointed an Electoral Commission consisting of the following members:

- Miss S M Bolton (Chair);
- Mr N Davis;
- Miss M A Norman;
- Mrs K Ramsay; and
- Mr P Whiteway,

whose biographies are included in Appendix 2.

³ <https://www.cpahq.org/media/10jkk2nh/recommended-benchmarks-for-democratic-legislatures-updated-2018-final-online-version-single.pdf>

⁴ <https://www.gov.im/media/1379206/final-electoral-commission-terms-of-reference-2022.pdf>

METHODOLOGY

5. In carrying out our review, it was important to publicise the Electoral Commission’s remit and seek to obtain a range of views on the various issues set out in the Tynwald resolution.
6. Publicity was undertaken through an Electoral Commission website⁵, interviews on Manx Radio and press releases drafted with the assistance of the Cabinet Office’s Communications Team, which were reported in the local newspapers and other media.
7. In addition to issuing a general invitation for members of the public to contact the Commission, invitations to provide submissions in writing or in-person were sent to various stakeholders with particular experience of elections. This included Members of Tynwald and DROs, as well as organisations representing the interests of particular groups likely to be affected by accessibility issues. The Commission also held public meetings during May and June 2023 in Ramsey, Douglas, Ballabeg and Peel. A list of those individuals or organisations who provided written or in-person submissions is set out in Appendix 3.
8. We are grateful for the assistance that we received from officers from the Cabinet Office, Crown & Elections Team and the Department of Infrastructure Mapping Unit.
9. A public consultation was conducted during the period 23 May 2023 to 28 July 2023. The consultation was available on-line through the Isle of Man Government Consultation Hub⁶ or could be completed in paper form. The on-line consultation elicited 191 responses. A small number of other written responses were received and reviewed. An analysis of the responses is available on the Electoral Commission website⁷.
10. In November/December 2023 a further consultation was held on the proposed boundary changes. The public were invited to comment, and MHKs and Commissioners in affected constituencies were invited to attend in-person meetings. Written submissions were received from some MHKs and Commissioners and a small number of members of the public. While opposition to proposed changes was received from some Commissioners and MHKs, the public response was very limited.

REPORT STRUCTURE

11. The report deals in Part A with the review of the number and boundaries of the constituencies in relation to elections to the House of Keys and in Part B with the additional matters outlined in the Tynwald resolution. Any recommendations made are set out at the end of the relevant section.
12. A number of issues were raised during the course of our review which, although not falling directly within the matters referred to in the Tynwald resolution, were sufficiently connected with them that we felt it appropriate to highlight them within this report. Although they are not directly reflected in our recommendations, we invite Tynwald

⁵ <https://www.gov.im/about-the-government/government/isle-of-man-electoral-commission/>

⁶ <https://consult.gov.im/cabinet-office/the-work-of-the-electoral-commission/>

⁷ <https://www.gov.im/about-the-government/government/isle-of-man-electoral-commission/>

members to note them in the hope that they will inform future policy development and debate.

PART A

THE NUMBER AND BOUNDARIES OF CONSTITUENCIES

THE REVIEW

1. In carrying out its review of the number and boundaries of constituencies, the Commission was requested to review but not limit itself to:
 - (a) Size and population of constituencies – are current boundaries appropriate? Is representation fair and equitable?
 - (b) Should population be the sole guide to constituencies and boundaries?
 - (c) Should there be a change to the number of constituencies?
 - (d) Are two seat constituencies working?
 - (e) Would single seat constituencies work better than constituencies having two or more seats?
 - (f) Could duplication of work be avoided in constituencies having two or more seats?

RECENT HISTORY

2. There have now been two General Elections to the House of Keys held since the major changes made to the number and boundaries of the constituencies as a consequence of the three reports to Tynwald of the Boundary Review Committee in 2011, 2012 and 2013 respectively.⁸
3. Prior to those reports, changes had last been made to the constituencies in 1985, since when there had been eight constituencies returning one member, five returning two members (all of which were town constituencies) and two returning three members.
4. At its sitting in December 2011, Tynwald considered and approved certain fundamental principles set out in the First Interim Report of the Boundary Review Committee⁹, which included equality of representation (i.e. all voters having the same number of votes) and equivalency of constituencies (i.e. each constituency having as close to equal a number of voters, or number of individuals – whichever was decided on – per MHK as is possible).
5. In its Second Interim Report¹⁰, having considered the various permutations, the Boundary Review Committee recommended that the twenty-four seats of the House of Keys be divided into twelve constituencies of two members each. That recommendation was approved by Tynwald in October 2012.
6. In its final report¹¹ in May 2013, having applied the principles of equality and equivalency, the Boundary Review Committee made recommendations as to the names of the new constituencies and the location of their boundaries, which were approved by Tynwald at its

⁸ <https://www.gov.im/about-the-government/departments/cabinet-office/information-archive/boundary-review-committee-2010-13/>

⁹ <https://www.gov.im/media/626717/brcinterimreport2011.pdf>

¹⁰ <https://www.gov.im/media/628133/brcsecondinterimreport2012.pdf>

¹¹ <https://www.gov.im/media/629339/june2013brcreport.pdf>

June sitting. The recommendations in the Second Interim and Final Reports were subsequently given legislative effect in section 60 of the Elections (Keys and Local Authorities) Act 2020.

INTERNATIONAL STANDARDS

7. Concerning the elections to the legislature, the CPA Benchmarks¹² state that members of the popularly elected or only house shall be elected by direct universal and equal suffrage in a free and secret ballot.
8. In its Code of Good Practice in Electoral Matters¹³ adopted in October 2002, the Venice Commission (of the Council of Europe) stated that the five principles underlying Europe's electoral heritage are universal, equal, free, secret, and direct suffrage.
9. Concerning equal suffrage, this was stated¹⁴ as entailing:
 - *“Equal voting rights: each voter has in principle one vote; where the electoral system provides voters with more than one vote, each voter has the same number of votes; and*
 - *Equal voting power: seats must be evenly distributed between the constituencies,”*
Meaning that amongst other things: -
 - *“It entails a clear and balanced distribution of seats among constituencies on the basis of one of the following allocation criteria: population, number of resident nationals (including minors), number of registered voters, and possibly the number of people actually voting. An appropriate combination of these criteria may be envisaged.*
 - *The geographical criterion and administrative, or possibly even historical, boundaries may be taken into consideration.*
 - *The permissible departure from the norm should not be more than 10% and should certainly not exceed 15% except in special circumstances (protection of a concentrated minority, sparsely populated administrative entity).”*

CONTINUING APPLICATION OF THE PRINCIPLES OF EQUALITY AND EQUIVALENCY

10. The adoption by Tynwald in December 2011 of the principles of equality and equivalency brought the Island into alignment with the international standards which apply across the Commonwealth and Europe. Accordingly, when considering the extent to which change is required to the boundaries, we took the view that the starting point should be that those principles continue to be applied unless an exceptionally strong argument can be made for the Island to be treated differently.
11. From the responses received, either individually or as part of the public consultation, whilst there was some support for departing from the equality and equivalency principles,

¹² [recommended-benchmarks-for-democratic-legislatures-updated-2018-final-online-version-single.pdf](https://cpahq.org/recommended-benchmarks-for-democratic-legislatures-updated-2018-final-online-version-single.pdf) (cpahq.org)

¹³ <https://rm.coe.int/090000168092af01>

¹⁴ <https://rm.coe.int/090000168092af01> (page 6)

particularly from individuals who considered that they had been adversely affected by the 2013 boundary changes, the overwhelming majority of respondents recognised the importance of the principles and supported the continued adherence to them.

12. In the absence of a mandate to depart from the international standards, in undertaking our review of the number and boundaries of the constituencies we have posed the following questions:
 - Whether there should be a change to the number of constituencies, with a corresponding change to the number of MHKs to be elected per constituency so that each constituency continues to be represented by an equal number of MHKs and, if so, where the constituency boundaries should be drawn; and
 - If no change is required to the number of constituencies, what changes need to be made to the constituency boundaries to take account of population changes which have occurred since 2013?
13. In considering both questions, we have kept in mind that changes to boundaries can be a very emotive issue, in particular where the effect is to split an established urban area so that a neighbourhood then forms part of a predominantly rural constituency. Indeed, some Onchan residents who were moved into the constituency of Garff in 2013 informed us that they now consider themselves to have been disenfranchised as a result. We also recognise that, to avoid unnecessary disruption, changes of constituency boundaries should be kept to the minimum necessary to retain adherence to the principles outlined above.

CONSIDERATION OF THE NUMBER OF CONSTITUENCIES

14. The starting point was to consider whether the present arrangement of twelve two-seat constituencies remains appropriate. This specific question was posed in the consultation as well as being discussed with those Members of Tynwald who met with us.
15. 40% of on-line consultation respondents agreed that 12 two-seat constituencies remained appropriate. Of the 52% who disagreed, the reasons given were various and not always relevant to the question. For example, of the 52% who disagreed the system should stay the same, half commented that they would like to see the total number of MHKs decreased. Having reviewed the extensive comments provided in this section, the Commission has concluded that this question was used to protest about a range of issues rather than exclusively to answer the matter posed on the existing split of twenty-four MHKs between the twelve constituencies.
16. Of those negative responses which were relevant to the question, the majority favoured a reduction in the number of constituencies to six, or fewer, with some respondents suggesting a single all Island constituency. Reasons given for reducing the number of constituencies included greater focus on national issues rather than local issues; less reliance on friends and family to get elected; and representation of a wider point of view.
17. The minority who supported an increase to twenty-four single-seat constituencies suggested that this would improve accountability and reduce the workload and cost of standing for candidates, which might encourage more candidates to come forward.

18. The analysis of the consultation responses showed that, of those respondents whose responses were relevant in the context of the question, the overwhelming majority were in favour of retaining the status quo. Comments ranged from *“if it isn’t broken, don’t fix it”* to statements that the system was working well and that having two MHKs meant that there was always at least one available to assist constituents. There was, however, a perception of difficulty in obtaining assistance if both constituency MHKs are Ministers. There was concern that larger constituencies would pose a challenge to candidates in canvassing for votes. This was echoed by a small number of the Members of Tynwald with whom we met.
19. Of the Members of Tynwald who expressed a preference, the greatest support was for the retention of the status quo, with as many wishing to increase the number of constituencies as decrease it. The small number of Members of Tynwald in favour of single-seat constituencies suggested that this would make it easier for MHKs to be visible across their constituencies, particularly where the constituency comprised an urban area with a large rural hinterland.
20. Mention was made in the responses to the on-line consultation of the possibility of duplication of effort being an issue in multi seat constituencies or, alternatively, a matter not being picked up by any of the constituency MHKs, but neither of these were identified as possible issues by the majority of respondents. Whilst the Commission suggests that MHKs be mindful of the possibility of these issues arising, how individual MHKs represent their constituents, and work with their constituency colleague(s), has to be a matter for them.
21. Thus, the consensus of opinion is that the present arrangement should be retained, and we are in agreement with this. A concern clearly expressed by respondents was that moving to twenty-four single-seat constituencies would focus what should be a national Parliament on local issues, many of which should be the preserve of local authorities. Indeed, the Keys constituencies would be more numerous, and in some cases smaller, than the existing local authorities.
22. The Commission has also been tasked by Tynwald to have due regard to the potential costs of its recommendations. In this regard, moving to twenty-four single-seat constituencies would significantly increase the costs of holding general elections. Double the number of DROs and more election staff would be required. There would be a commensurate increase in the costs of printing ballot papers and providing all the other stationery, etc. and there would also be practical difficulties, for example, identifying suitable polling stations in each constituency.
23. Moving from the current twelve, two-seat constituencies would necessitate a fundamental redrawing of the boundaries, a task not to be embarked upon lightly. Nevertheless, had the work of the Commission evidenced a strong desire to move away from the current system, this report would have made recommendations accordingly. However, this has not been the case. Thus, **the Commission is recommending that the present system of twelve two-seat constituencies be retained.**
24. It should be noted that several of the Members of Tynwald who were in favour of retaining the status quo indicated that they would support a reduction in the number of constituencies in the event of significant population growth. Given the Isle of Man

Government's plans to achieve such growth in the medium term, a reduction of this nature may well be a reality to be considered by a future Electoral Commission.

ON WHAT CRITERION SHOULD THE SIZE OF CONSTITUENCIES BE BASED?

25. The equivalency principle was given effect in 2013 through calculating the size of each constituency based on the average resident population figure with a permitted variance of 15%. The Venice Commission considers resident population to be a valid allocation criterion, but there are others, including the number of registered voters. Evidence taken by the Boundary Review Committee showed there was greater support for the resident population being used as the basis of the calculation than registered voters or eligible voters.
26. The Commission consider that using population rather than registered voters is consistent with the intention of improving the accessibility of elections in the Isle of Man. Research from the Electoral Reform Society highlights:

"Those not on the [electoral] register are typically younger, from lower income groups, renters and people of colour."¹⁵

Areas with high populations of renters in the Isle of Man typically have lower voter turnout. The Commission considers that using population rather than electoral registration is likely to improve accessibility to the democratic process.

27. This question was asked again by the Commission in the public consultation, and put to those who made individual submissions. Of those responding to the consultation:
- 52% considered that the constituency size should continue to be based on population.
 - 40% answered in the negative.

Of this 40%, when asked on what the constituency size should be based if not population:

- 17% were in favour of registered electors,
- 41% said eligible voters,
- 29% of respondents chose "don't know" or "other".

This was not contradicted by the individual submissions.

28. **In view of the above, we consider that the resident population should continue to be the allocation criterion used in calculating the size of constituencies.**
29. When dividing any area into constituencies based on population size, it is not a purely mathematical calculation. Other criteria may be taken into account, including geographical features¹⁶ and administrative, or possibly even historical, boundaries. However, the standard adopted by the Venice Commission is that the permissible departure from the norm should

¹⁵ <https://www.electoral-reform.org.uk/campaigns/upgrading-our-democracy/fair-boundaries/>

¹⁶ In particular those which would provide a barrier between adjacent land areas, such as large rivers, mountain ranges or bodies of water, including lakes and seas

not be more than 10% and should certainly not exceed 15% except in special circumstances such as the protection of a concentrated minority or a sparsely populated administrative entity. The Commission does not consider that either of those examples apply to the Island.

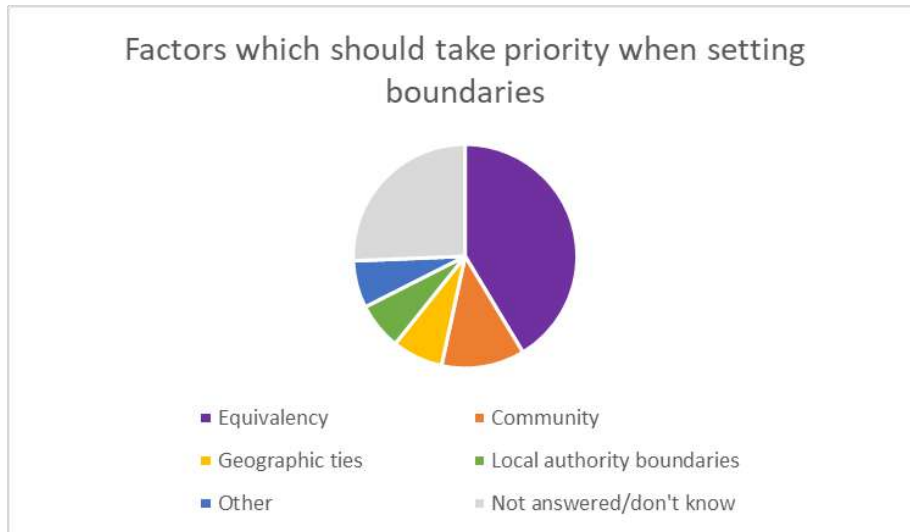
30. It was drawn to the Commission's attention that there are a small number of constituencies in the UK where significant deviation from the normal variance is allowed and accepted. The Commission does not consider that these examples are comparable with the landscape of the Isle of Man for the following reasons:
- a) The five exceptions in the UK are all islands¹⁷ and fit within the 'special circumstances' identified by the Venice Commission. It is not felt that the same justification could be used for communities within the Isle of Man as there are no land areas split by geographic features which would place them in that category.
 - b) The UK variance of 5% which otherwise applies in England, Wales and Scotland, is enshrined in law¹⁸ and is a much smaller range than is currently accepted within the Isle of Man. A slightly greater variance is permitted in Northern Ireland using a statutory calculation. But, according to the 2023 report of the Northern Ireland Boundary Commission,¹⁹ this currently provides a variance of about 7%.
31. Although Tynwald had adopted the recommendation made by the Boundary Review Committee that the permitted variance should not exceed 15%, the Terms of Reference requested us to consider the issue afresh. Accordingly, the public consultation included the following questions:
- i. *Existing boundaries of constituencies have been established that meet the principle of equivalency of population size. Should other factors take priority when setting boundaries?*
 - ii. *If you answered yes to [i], which one of the following should take priority? Geographic area/size; Community/local ties; Local Authority Boundaries; Other.*
 - iii. *The size of the Island's constituencies is currently based on population. In order to ensure equal voting power a maximum of 15% variance is permitted from the average population size (or whatever other criteria is chosen instead). Would exceeding this level of variation ever be justified?*
32. Just over a third of respondents to the on-line consultation (36%) thought that other factors than equivalency should take priority. Of those who felt other factors should take priority 12% thought community should take priority, 7% thought geographic ties and local authority boundaries respectively should and 7% gave a range of other factors. Other factors suggested included local amenities and the economic significance of an area. Many of the comments in relation to both questions were not relevant, which made identifying any common themes difficult. Despite the way in which questions (i) and (ii) were answered, 43% of those who responded to question (iii) were of the view that exceeding the 15% level of variance would never be justified, with only 25% taking the contrary view.

¹⁷ namely the Isle of Wight (two-seats), Na h-Eileanan an Iar (Western Isles), Orkney and Shetland, and Ynys Môn

¹⁸ <https://www.legislation.gov.uk/ukpga/1986/56/schedule/2>

¹⁹ <https://www.boundarycommission.org.uk/files/boundarycommission/2023-07/Final%20Recommendations%20Report%20of%20the%202023%20Review%20of%20Parliamentary%20Constituencies.PDF>

None of the individual submissions included any arguments which materially altered the position.



33. Accordingly, our view is that the maximum permitted variance should remain 15% taking into account that a much smaller variance of 5% is enshrined in statute in the UK.

Recommendation 1

Tynwald affirm that the Island should continue to adhere to international standards by ensuring that each constituency is of approximately equal size by population, maintaining the maximum permitted departure from the average in any constituency at 15%.

34. We also take the view that the principle that the population size of constituencies should not vary from the average by more than 15% should be enshrined in statute.

Recommendation 2

Legislation be brought forward to enshrine in law the maximum permitted variance in constituency size as 15% of average population.

CONSIDERATION OF THE BOUNDARIES OF EXISTING CONSTITUENCIES

34. Tables showing the population of each constituency in 2011 and 2023 are included in Appendix 4. From these, it can be seen that, whilst all the constituencies were within the permitted variance in 2011, that is now no longer the case, with Glenfaba & Peel and Ramsey being currently 118% and 119% of the average respectively. Figures on current constituency size based on data provided by Government statistics in August/September 2023 are shown in the table below.

Constituency	Population	16 and Over Population	Number of registered electors	Percentage registered	Variation from 6,979 (optimum per constituency)
Arbory, Castletown & Malew	7,542	6,385	5,996	94%	108%
Ayre & Michael	6,319	5,501	5,086	92%	91%
Douglas Central	7,198	6,122	5,302	87%	103%
Douglas East	6,580	5,900	4,837	82%	94%
Douglas North	6,367	5,243	4,708	90%	91%
Douglas South	6,579	5,418	4,851	90%	94%
Garff	6,487	5,599	5,235	93%	93%
Glenfaba & Peel	8,240	6,876	6,296	92%	118%
Middle	6,276	5,200	4,768	92%	90%
Onchan	6,624	5,639	5,089	90%	95%
Ramsey	8,276	7,135	6,228	87%	119%
Rushen	7,257	6,242	5,805	93%	104%
Totals	83,745	71,260	64,201	90%	N/A

35. The CPA BIMR report²⁰ noted that, for the 2021 election, those two constituencies had respectively 15% and 14% more registered voters per constituency than the national average of voters per constituency. Douglas East, Douglas North and Douglas South had fewer voters than the national average, however within the 10 -15% limit. The Report considered this to be an acceptable difference but indicated that it needed to be addressed in the next review of the boundaries.
36. Changes will need to be made to the Keys constituency boundaries of Glenfaba & Peel and Ramsey if the required equivalency is to be maintained. In the case of Glenfaba & Peel, as the Town of Peel is surrounded on the landward side by rural areas which were part of the former constituency of Glenfaba, this can be achieved by identifying settlements adjacent to the boundary which can be moved in their entirety into the adjoining Keys constituency of Middle. The latter's population is below the average and moving entire settlements means that the relevant communities will not be split.
37. Regarding Ramsey, as there is no rural hinterland within the constituency, the only way in which the numbers can be reduced is to assign a section of the Town and add it to an

²⁰ <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

adjacent constituency. Depending on which part of the Town is decided upon, the residents will become part of either Ayre & Michael or Garff, both of which are currently below the average.

38. The Commission recognises how unpopular a similar decision in 2013 affecting residents within Onchan has proved with some voters. This was clear from comments made to us in person and in response to the consultation. It would be much easier to say that, for the sake of a couple of per cent, the constituency should be left as it is and an increased variance accepted. The Commission considers that there are sound reasons for rejecting this argument.
39. Firstly, the greater the permitted variance, the greater the inequality which can arise as greater variance dilutes voting power. If the variance is 5%, as in the United Kingdom, the maximum range of difference is 10% of the average. A variance of 15% permits a range of 30% of the average between the smallest and the largest constituencies. Every increase to the variance results in a doubling of the increase in the maximum difference. In the context of the Isle of Man, a 15% variance is equivalent to the population of Port St Mary or Laxey. It is a considerable variance in the Island's context and represents a significant dilution of an individual vote.
40. Secondly, if the larger constituencies keep getting bigger, this means that there is no possibility for the smaller constituencies to have their figures adjusted to bring them closer to the average except through positive population change in their areas. This is unlikely to happen in view of the current development and planning policies being focused around towns.
41. Thirdly, the principles must apply across the board. This means that an exception cannot be made for one constituency. Compliance with equality and equivalency is not a matter of individual personal choice.
42. The comments of the CPA BIMR²¹ concerning the Douglas constituencies (see paragraph 35 above) have been noted, but the only constituencies with populations above the average are currently Ramsey, Glenfaba & Peel and Arbory, Castletown & Malew, none of which are adjacent to the Douglas constituencies. The numbers of the latter can only be increased if there is a wholesale redrawing of the boundaries of most of the Island's constituencies.
43. The Isle of Man Government is promoting a significant increase in the Island's population in the short to medium term. This, combined with the recently announced policy of supporting the development of brownfield sites in urban areas, and the ongoing construction of a large residential estate around Ballasalla and of other estates on the periphery of several of the Island's towns, means that the next review of the Island's constituencies and their boundaries is likely to result in major changes. As indicated earlier, to avoid repeated change, which many consultation respondents identified as a negative, the Commission is looking to keep any changes at this stage to the minimum necessary to restore compliance with the Venice Commission's standards.
44. Looking first at the constituency of Glenfaba & Peel, the Commission identified an area adjacent to the border with the constituency of Middle comprising the Lhoobs Road area,

²¹ <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

past Archallagan down to and including those parts of Greeba that are not already within Middle (outlined in blue on the map exhibited as Appendix 5) which has an estimated population of 284. The result of assigning that area to the constituency of Middle would be to reduce the size of Glenfaba & Peel from 118% to 114% of the average, while increasing that of Middle from 90% to 94%. The area identified is rural in nature and its settlements do not form part of other communities.

45. The size of the constituency of Ramsey, which has a current population of 8,276, is presently 119% of the average. This means identifying an area of population of at least 278 (4%) and which can be considered, as much as possible, as an identifiable community, so that it may be assigned to an adjacent constituency. In the case of Ramsey, this meant identifying an area which could be assigned to either Ayre & Michael, in the case of North Ramsey, or Garff, in the case of South Ramsey. This resulted in the identification of two options as follows:
 - A part of North Ramsey comprising an area to the west of Clifton Drive, together with the newly developed Gibbs Road and Gibbs Park estates, Thornhill Park and an area of undeveloped land to the north of Bride Road (outlined in blue on the map exhibited as Appendix 6) which has an estimated population of 414. Assigning that area to the constituency of Ayre & Michael would reduce Ramsey to 113% of the average while increasing Ayre & Michael from 91% to 96%.
 - A part of South Ramsey comprising from its boundary with the constituency of Garff to include to Queen's Drive including the areas of Ballure Road, Stanley Mount, Walpole Road and Queen's Valley (outlined in blue on the map exhibited as Appendix 7) which has an estimated population of 680. Assigning that area to the constituency of Garff would reduce Ramsey to 109% of the average while increasing the Garff from 93% to 103%.
46. Consultation on proposed boundary changes was undertaken in November/December 2023. Proposed boundary change options were published on the Electoral Commission's website and information shared with the media and elected representatives encouraging feedback on the proposals. MHKs and Local Authorities in affected constituencies were invited to speak to the Commission and encouraged to bring forward representations from the public.
47. Written and in-person representations were received from some MHKs and Local Authorities invited to provide input. Public feedback was very limited despite active encouragement from the Commission and elected representatives. Social media commentary demonstrated that the community was aware of the consultation.
48. Feedback from the majority of affected MHKs who responded and from Ramsey Commissioners and German Commissioners was against any change to the Keys constituency boundaries, notwithstanding the democratic implications. There was an objection received from one Glenfaba & Peel resident and one response received from a South Ramsey resident who was supportive of the South Ramsey proposal.
49. Taking all relevant matters into account, the Commission considers that it is both necessary and appropriate to make the proposed change to the boundaries of the constituencies of Glenfaba & Peel and Middle.

50. If the principles of equality and equivalence are to continue to be adhered to, there is no alternative but to make a change to the boundary of the constituency of Ramsey. The Commission had hoped that the feedback from its consultation would indicate a preference for that change affecting one of the two areas which were the subject of that consultation.
51. In the absence of any preference being expressed, the Commission has had to identify and weigh up the competing arguments. In relation to the area in South Ramsey, it has long formed part of the historic Town of Ramsey. The area in North Ramsey, although now part of the Town, was previously a rural area forming part of the Parish of Lezayre and has only been developed in recent decades, with an area which is yet to be built on. Should the area of South Ramsey be assigned to the constituency of Garff, this would directly affect a larger number of people than would be the case should the area of North Ramsey be assigned to Ayre & Michael.
52. Further, the assignment of the area of South Ramsey to Garff would result in the creation of a constituency which had urban areas at each end separated by a mostly rural area. It is likely that the concerns of the constituents at one extremity may vary considerably from those at the other extremity, whereas there is likely to be more commonality between the residents of North Ramsey and those of Ayre & Michael.
53. Taking all the arguments into account, the Commission considers that it is both necessary and appropriate to make the change to the boundaries of the constituency of Ramsey by assigning that area of North Ramsey identified on the map at Appendix 6 to the constituency of Ayre & Michael.

Recommendation 3

The existing twelve two-seat constituencies be retained unchanged save for the changes to the boundaries between the constituencies of Middle and Glenfaba & Peel and the constituencies of Ayre & Michael and Ramsey as shown on the maps in Appendices 5 and 6, the purpose of such changes being to restore equivalency to the constituencies of Glenfaba & Peel and Ramsey.

54. It can be seen from the above that the challenges to maintaining the principles of equality and equivalency across constituencies are persistent and significant. The distribution of the Island's population taken together with plans to further develop existing urban areas will further exacerbate the issues that the Commission has faced during its review.
55. If the size of the population and its distribution changes as anticipated then an Electoral Commission should be appointed after the 2026 General Election to carry out a further review of the constituency boundaries. This is provided for in section 57 (3) of the Elections (Keys and Local Authorities) Act 2020, which enables the Governor in Council to appoint an Electoral Commission at any other time if a resolution of Tynwald so directs.

Recommendation 4

In the event of significant change to the population and its distribution, that an Electoral Commission be appointed after the 2026 General Election to carry out further review of the constituency boundaries.

PART B

The Tynwald resolution requested that the Electoral Commission consider a number of other matters in addition to constituency boundaries:

- *Accessibility of elections to voters;*
- *The organisation of Pre-Election Meetings;*
- *Postal voting procedures;*
- *Proxy voting procedures;*
- *Ability to vote at any polling station across a constituency;*
- *The feasibility of setting up one or more "All Island" Polling stations; and*
- *Candidate campaign materials.*

ACCESSIBILITY OF ELECTIONS

1. The Tynwald Motion directs the Electoral Commission to consider the accessibility of elections to voters. The Motion also asks the Commission to consider the potential costs of its recommendations. In carrying out its review, the Commission was requested to review, but not limit itself to:
 - (a) Review of the 2021 General Election and how well it complied with the Equality Act?
 - (b) Should there be any mandatory venue attributes identified for future voting locations?
 - (c) Are there any additional accessibility measures which should be incorporated into future planning and administration?
2. In considering accessibility to elections, the Commission therefore took a broad view; it did not solely limit itself to physical accessibility but also took into consideration that social, cultural and language barriers might contribute to non-participation in the electoral process. The Commission was mindful of the requirements placed on public authorities by the Equality Act 2017²².
3. The factors considered included:
 - physical disability and other mobility issues;
 - mental disability or neurodiversity;
 - new residents who may be unaware of their right to vote in Manx elections generally after residence of 1 year;
 - people who are time poor who may intend to vote but due to location of polling stations or caring responsibilities, for example, are disinclined or unable to take the time needed to attend a polling station due to a range of circumstances; and
 - young people who may not feel engaged in the electoral process.
4. The Commission has considered all these potential hindrances to enfranchisement and makes a number of recommendations intended to remove or reduce impediments to

²² https://www.legislation.gov.im/cms/images/LEGISLATION/PRINCIPAL/2017/2017-0005/EqualityAct2017_2.pdf

voting. Some of these may be regarded as a direction of travel towards improving the openness and accessibility of the electoral system for all eligible voters, including those who will become voters in the future.

5. To this end the Commission will recommend a number of changes to voting processes by which some of the impediments to voting can be reduced as well as improving access to Polling Stations.

PHYSICAL ACCESSIBILITY OF ELECTIONS

6. In relation to physical accessibility, the CPA BIMR Report²³ on the Isle of Man General Election of September 2021 contains a number of observations and recommendations relevant to the work of the Commission. The report summary states that:

“The Mission found that access for persons with disabilities to the political process was feasible but difficult, despite efforts to make it easier. For instance, the Mission observed that half of all observed polling stations were not independently accessible to voters with mobility issues”.

7. CPA BIMR Recommendation 5²⁴ is that:

“In order to fully comply with the Equality Act, the electoral process should be fully accessible to persons with disabilities. In particular, all spaces used for the purpose of an electoral process, during the campaign and on Election Day, should be independently accessible.”

8. In reviewing matters concerning accessibility, the Commission heard from the Tynwald Representative for the Commonwealth Parliamentarians with Disabilities Network, the Department of Infrastructure Accessibility Steering Group, and Sight Matters and took into consideration responses from the public consultation and in-person interviews with DROs and Members of Tynwald.
9. Accessibility issues can be wide ranging and adversely affect the ability of people to attend a polling station and/or to vote having arrived at the polling station. Of the responses to the on-line public consultation, 14% identified accessibility issues. Feedback highlighted the problems faced in particular by people who use wheelchairs and mobility scooters, but some people with sight impairment, hearing impairment and those with neurodiverse conditions, for example those on the autistic spectrum, also reported experiencing difficulties with the voting process or indeed could not vote in-person.
10. Poor accessibility can also prevent or deter people who are carers or those who are elderly or infirm from voting. More broadly, if a polling station lacks adequate parking and/or is not on a regular bus route then it will not be sufficient to ensure that the premises itself is accessible. The absence of dropped kerbs close to polling stations also creates a barrier for people who use wheelchairs, mobility scooters, crutches etc. The same issues apply across

²³<https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

²⁴<https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

the whole electoral process, whether attending a pre-election meeting, a polling station, or a count.

11. The CPA noted that efforts had been made by the Cabinet Office to improve access. For example, ramps were available at many of the polling stations, although not always of a suitable design, and lower-level polling booths for wheelchair users were provided, although not all were orientated to be easily accessible. The Commission also recognises that securing suitable, fully accessible venues for use as polling stations is a considerable challenge and, in some constituencies, may not be possible.
12. Postal voting may provide a viable alternative for people with physical and neuro-divergent conditions who might struggle to access a polling station. The significant uptake in postal voting at the 2021 General Election indicates that this is an effective and increasingly popular option. There are other options too which would almost certainly help increase participation in the election process for people with physical and neuro-divergent conditions, notably, the ability to vote at any polling station within a constituency and, potentially, on-line voting. These options are examined in detail later in this report.
13. Nevertheless, it is the right of anyone who wishes to vote in-person at a polling station that they should be enabled to do so in so far as this is reasonably possible. Consideration of the CPA BIMR report ²⁵ and of comments made to the Commission, indicate that there is more that can be done to reach this goal.
14. The starting point is for **a full, systematic, accessibility audit to be undertaken of every premises intended to be designated as a polling station**. This should include proximity to regular bus routes and nearby parking spaces, including disabled parking. This work should be undertaken in conjunction with representatives of, and people with, physical disabilities and neurodiversity in order that barriers to access are effectively identified and remedied. Accessibility audits should also be conducted on premises to be used for pre-election meetings.
15. Whilst improved access must be the aim for every designated polling station, at least one polling station in each constituency must be made fully accessible and publicised as such, so that anyone with physical disabilities or neurodiversity, who is elderly or infirm, has the option of attending that polling station to cast their vote. This Recommendation ties in with Recommendation 12 in that, to be effective, it will be necessary for voters to have the option of being able to vote at any of the polling stations in their constituency.
16. It will be insufficient to deliver structural improvements to access without also assisting people to gain full advantage from these changes through engagement, communication and training for election staff. **The Cabinet Office should publish details concerning the level of accessibility of polling stations and other venues used for election purposes, including any features that would help or hinder access and actively promote this information to organisations that support people who may experience difficulties with accessibility.**
17. Feedback to the Commission from in-person meetings and from the public consultation highlighted that election staff would benefit from training. This is in relation both to the

²⁵ <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

use of equipment such as ramps, and to more general guidance regarding providing appropriate levels of assistance and support during the voting process. This can be done as an adjunct to an accessibility audit.

18. The attention of the Commission was also drawn, on a number of occasions, to the impact that groups of candidates, candidates' representatives, media, tellers, etc. at the entrance to polling stations has on people who are neuro-divergent or who experience anxiety. **This is an area that requires management by the Presiding Officer at the polling station and may usefully be addressed in an election manual.**
19. In the public consultation, of the 26 people who identified that they experienced difficulties with access, 19 did not know that the DRO could be contacted in advance to discuss any special assistance that might be required. **More promotion is required concerning the role of the DROs.**

Recommendation 5

A full accessibility audit be undertaken of every premises intended to be designated as a polling station including suitable parking with disabled spaces and access to bus routes. The Cabinet Office to publish details concerning the level of accessibility of polling stations and other venues used for election purposes. At least one polling station in each constituency to be made fully accessible and publicised as such.

ACCESSIBILITY OF THE ELECTION FOR CANDIDATES

20. The Commission received feedback from a few Members of Tynwald on the accessibility challenges for potential candidates seeking election to Tynwald. The Commission noted the difficulties posed for those with mobility challenges when canvassing and that reasonable adjustments may need to be made for candidates with disabilities.
21. The Commission notes positive feedback on developments such as on-line availability of meetings with candidates and manifesto materials, and would encourage further development in this area to improve accessibility of information for voters and ease dissemination of information for candidates.
22. Recommendations intended to improve accessibility of elections for voters will equally benefit candidates, and accessibility audits of buildings used for election meetings and polling stations will also reduce issues for candidates seeking election for whom physical accessibility is a challenge.
23. Feedback given, and consideration of these matters, should inform future development and debate in this area to ensure that accessibility of elections for candidates is not an

impediment to seeking public office. In particular, the attention of the Commission was drawn to the high level of investment and support provided in Scotland to individuals whose candidature might be adversely affected by mobility or other challenges. The Commission also spoke with the election team for Wales, where work on accessibility is currently taking place, including consideration of financial assistance for disabled candidates. **Those who wish to seek election who have concerns about accessibility issues should be encouraged to contact the Crown and Elections office to seek reasonable adjustments and this should be signposted at the time of nominations opening.**

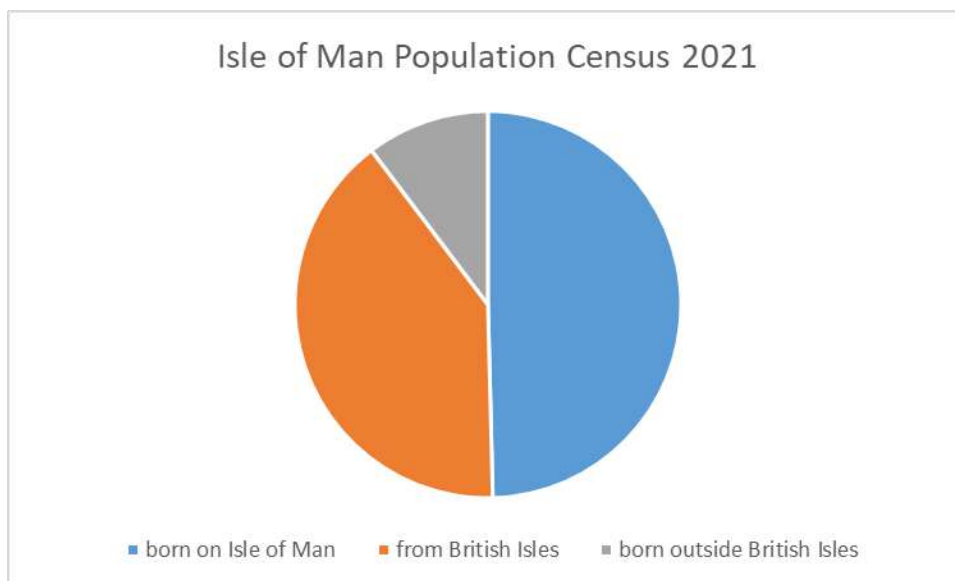
AWARENESS AND ENGAGEMENT WITH THE ELECTORAL PROCESS

24. As highlighted above, in considering accessibility to the elections, the Commission did not solely limit itself to physical accessibility but also took into consideration that social, cultural and language barriers might contribute to non-participation in the electoral process. This is an area that was raised within the CPA BIMR report²⁶ and to which their recommendation 4 concerning voter registration refers.

“Further efforts could be undertaken by the Crown and Elections Team to develop methods to encourage registration amongst any under-represented groups.”

25. Registering to vote is a legal requirement and is necessary to vote at an election, therefore increasing the involvement of under-represented groups in elections begins with engagement and registration.
26. Voter turnout at General Elections has been steadily falling. The 2021 election saw 50.68% of eligible voters turn out across the Island compared to 52.96% in the 2016 General Election. The highest turnout of voters was 62.49% in Ayre & Michael and the lowest in Douglas East at 32.23%, compared to 2016 where the highest turnout was 65.4% in Ayre & Michael and the lowest was 40.1% in Douglas East.
27. Falling participation in elections is not by any means unique to the Isle of Man. However, the Commission is of the view that there may be more specific factors that create barriers to people accessing the electoral process in the Island.
28. The Isle of Man is increasingly home to people who have moved here, primarily from other parts of the British Isles, but also from other parts of Europe and further afield. The 2021 census shows that while 49.6% of the population was born on the Island, 10.3% is from outside the Isle of Man, UK and Republic of Ireland. This is a rise of 8.3% from 2016. With the stated aim of the Government being to grow the economically active population of the Island, more people are likely to come to the Isle of Man to settle and work.

²⁶ <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>



29. The substantial absence of party politics in the Isle of Man, with candidates predominantly standing as independents, can be challenging for people from outside the Island who are more used to engaging with, and making decisions based upon, party campaigns and manifestos which set out what an elected Government intends to deliver.
30. To be fully representative of the issues and aspirations of an increasingly diverse population, the Commission considers it to be extremely important that new residents be helped and encouraged to secure sufficient awareness and understanding of the Manx electoral system to feel confident to exercise their vote.
31. Additional outreach needs to focus on communities where English is a second language. A short survey was conducted by Cafe Lingo on behalf of the Commission in July 2023; 18 people responded, none of whom spoke English as a first language. Of the 10 who knew they were eligible to vote, only 2 had done so. More information about candidates, translations from English and voting on-line were some of the suggestions made to make it easier to vote. This was a very limited exercise, but indicative perhaps of some of the non-physical barriers faced by those eligible to vote.
32. The Commission also heard comments from several Members of Tynwald that more should be done to engage young people and encourage them to vote. Engaging young people in politics is critical to a future healthy, functioning democracy. Young people in the Isle of Man are of course eligible to vote from 16 years of age. In the 2021 General Election there were 950 eligible voters aged 16-17 years of which 436 voted (46%).²⁷
33. The Department for Education, Sport and Culture (DESC) was approached by the Commission seeking information on what was in place to help young people understand the Manx democratic process and voting, DESC provided details of a wide range of activities taking place in both primary and secondary schools aimed at informing and

²⁷ <https://www.gov.im/media/1379924/2021-general-election-turnout-v2.pdf>

educating pupils about Manx democracy. The Department advised that some secondary schools deliver assemblies or tutorial sessions which explain how the Manx political system works and why it is important to vote and that secondary schools currently include a session on “*the Student Voice*”, which covers Manx politics and how to have your voice heard. The Crown and Elections Office staff have also attended a number of school assemblies.

34. The Department further advised that teachers who are new to the Island and Early Career teachers are invited to an Introduction to the Isle of Man course, which includes Manx history, language and politics.
35. Future plans include the Advisory Teacher for the Manx Curriculum creating a pupil textbook for all secondary schools based around Manx politics ahead of the 2026 General Election and, during the next academic year, a new module entitled ‘Who Rules’ will be undertaken by Year 11 students as part of their citizenship lessons.
36. During its work the Commission also met with a representative from the Clerk of Tynwald’s Office where it was explained that it has a key responsibility for promoting awareness of the Manx democratic process. The Office is active in this regard, having, for example, organised Junior Tynwald annually and indeed recently having launched a new Youth Select Committee which aims to enable young people across the Island to scrutinise and hold inquiries on topics of interest to them. Students also have tours of the Legislative Buildings and sit in the gallery for Tynwald sittings. The Office noted that, with additional resources, there is more that could be delivered both for students and for groups that may be under-represented at elections.
37. It is clear from the enquiries made by the Commission that there is an increasing amount of work taking place to inform young people about the Manx political system and encouraging them to vote. How far this translates into active participation in elections in the future will be important to monitor.
38. **In conclusion, the Commission considers that there is scope to do more to engage in particular new residents, and those with English as a Second Language, and other groups which may be underrepresented.** This would entail an increase in the resources available for this work. Increased engagement in the electoral process might of course be regarded as a strong measure of successful integration into Island life. This is an investment that the Commission feels should seriously be considered.

Recommendation 6

The Clerk of Tynwald be invited to put forward costed proposals for electoral awareness campaigns aimed in particular at new residents and people with English as a second language.

ELECTRONIC AND ON-LINE VOTING

39. The Commission was requested to review the accessibility of elections to voters, including but not limited to:
- (a) Review of the 2021 General Election and how well it complied with the Equality Act?
 - (b) Should there be any mandatory venue attributes identified for future voting locations?
 - (c) Are there any additional accessibility measures which should be incorporated into future election planning and administration?
40. As stated above, the Commission took a broad perspective of the meaning of accessibility, including for those with physical disabilities or neurodivergence, recent arrivals, non-English speakers, the youth and time poor individuals.
41. Methods of improving accessibility to elections generally which were investigated by the Commission are on-line and e-voting:
- e-voting is physically supervised by representatives of governmental or independent electoral authorities (e.g. electronic voting machines located at polling stations);
 - remote on-line voting via the Internet (on-line) is where the voter submits his/her vote electronically to the election authorities, from any location.
42. The Commission is not recommending e-voting, as the cost of the relevant machines is prohibitive, the technology is outdated quickly and does not support a transition to on-line voting in the future.
43. On-line voting offers many advantages and has the potential both to increase the numbers of those voting and to widen participation within groups who may not historically have been engaged in the process, thereby increasing the democratic mandate. The ability to vote using a device such as a tablet or smart phone provides more opportunities for those who undertake shift work for example, also full-time carers, students, people who experience anxiety attending public gatherings and people whose levels of disability make visiting a polling station challenging.
44. There are of course other voting options available, for example the postal vote, but none offer the ease and flexibility that on-line voting may do. Indeed, there is the possibility that people could vote on-line ahead of Election Day if that were deemed appropriate.
45. In-person discussions with Tynwald members indicated a favourable view towards on-line voting. It was frequently noted that people were accustomed to banking, submitting tax returns and accessing sensitive health records on-line and voting on-line could be seen as a continuing trend. Feedback also emphasized the importance of on-line voting being offered as an additional option rather than replacing other methods of voting.

46. In the public consultation, a significant number of respondents (74%) stated that they would be willing to vote on-line via the internet provided suitable security controls were implemented. Just under 20% of respondents would not want to vote on-line and 6% did not have a preference.
47. Asked whether on-line voting should be offered alongside the voting methods currently available the same number (74%) agreed. Of the remaining respondents 20% did not think the Isle of Man should have an on-line voting option and 6% did not have a preference.
48. Digitisation can be used in different parts of the electoral process, for example, internet on-line voting technology can increase speed of the counting of ballots, reduce the cost of staff to count votes manually and can provide improved accessibility.
49. Voters save time and cost by being able to vote independently from their location and this may increase overall voter turnout.
50. A common concern, however, was raised around adequate security controls of an on-line voting platform. Below are comments received during the public consultation.

“Too insecure, who would be responsible for ensuring standards island wide and could guarantee it?”

“The protection and governance are not adequate. It is very difficult to ensure the vote can’t be linked back to the voter and almost impossible to ensure the voter is who they say they are when casting the vote without for example significant citizen digital ID.”

51. Many countries use on-line voting to varying degrees, but no country (with one notable exception, Estonia) has used it in national elections. Estonia has significant experience in this form of voting, on-line voting having been used there for Parliamentary elections since 2007. The usage of their system has increased from 5.5% (2007) of participating voters to 43.3% in 2019 Parliamentary Elections.
52. It should be highlighted that the Estonian e-voting system requires every voter to have a digital identity card that is mandatory for a vote to be cast, which is currently different to the Isle of Man where no proof of identity is necessary to vote.
53. An additional complexity that needs to be addressed is the right given to every voter by Article 3 of the First Protocol to the European Convention on Human Rights²⁸. This requires the holding of *“free elections at reasonable intervals by secret ballot, under conditions which will ensure the free expression of the opinion of the people in the choice of the legislature.”* This means not only that on-line votes must be securely transmitted and stored, to be opened and counted only after the personal data is removed, but also that the entire system must be safe from external influence.

²⁸ ECHR has applied to the Isle of Man since 1953 but was also incorporated into Manx domestic law by the Human Rights Act 2001.

54. The Commission is aware that the UK Government and some UK local authorities have investigated on-line voting systems. The UK Government worked with an organisation called Mi-Voice²⁹, which in 2007, together with a partner, developed a statutory e-voting platform for the UK's Governmental Electoral Modernisation Program.

55. In 2007, the UK Government ran several electoral modernisation pilots at local elections, including on-line voting. The subsequent report³⁰ found that:

“whilst the pilots had on the face of it, delivered successfully, there was an unnecessary high level of risk associated with all pilots and the levels of testing, security, reliability and quality assurance adopted were insufficient”.

It should be noted that the UK government has not utilised on-line voting in any UK elections to date.

56. In our discussions and investigations, a key element coming through was the importance of transparency and public trust and confidence in the technology and systems being used for the elections. Consequently, as the UK Report indicates, any on-line voting system would need to ensure its security and reliability is sufficient, ensure adequate transparency to build stakeholder acceptance and have a certification process to provide independent assurance to facilitate an informed decision on the technology.

57. The Commission was interested to note that in the Netherlands in 2007, in response to concerns about the lack of security and audit mechanisms in the country's electronic voting machines (located in polling stations), the Government established two parliamentary Commissions. Both Commissions' reports strongly criticised the management of voter technologies. Subsequently, the Government abandoned electronic voting returning to a paper-based system.³¹

58. Clearly, on-line voting is an attractive proposition but there is considerable work to be done before the Island could be confident that the introduction of such a system would provide the necessary securities to meet the confidence of the voting public and the Island's obligations. Any such introduction would require the enactment of primary legislation, the process of which would involve the usual assessment of Human Rights compliance.

59. The Commission noted that the Election team for Wales is currently undertaking a review into on-line voting. There is an opportunity to collaborate with them and potentially other jurisdictions to investigate this topic comprehensively. The reported experience of the Welsh team demonstrates the scale of the challenge and the need for the Isle of Man to conduct its own feasibility study, allowing sufficient time and resource.

²⁹ More details can be found at: www.mi-voice.com.

³⁰ <https://www.parliament.uk/globalassets/documents/speaker/digital-democracy/electoralcommission.pdf>

³¹ <https://www.ndi.org/e-voting-guide/examples/re-evaluation-of-e-voting-netherlands>

60. In the meantime, some steps can be taken to improve the election process through technology which potentially could lead to the capability to run elections with an on-line element; for example, full digitisation of the Electoral Register and on-line registration.
61. Upon digitisation of the Electoral Register, a technological solution identified as deliverable by Government Technology Services is the introduction of QR codes (or similar identifiers) on polling cards. The Commission feels that this will enhance the benefit of the digitisation of the Electoral Register that will happen upon the introduction of voting in any polling station within an individual constituency. This should speed up the process at the polling station to the advantage of voters and election staff.
62. The moves set out above would be of benefit to the current process and to any future developments. But the Island should remain mindful of lessons learned in other jurisdictions.

Recommendation 7

The Council of Ministers commission a feasibility study on the potential introduction of on-line voting taking into account the advancement of technology that is now available and the technical and legal implications thereof including a cost benefit analysis.

In the meantime, all efforts should be taken to develop the technological building blocks that enable more automated elections, including the full digitisation of the Electoral Register and on-line registration.

THE ORGANISATION OF PRE-ELECTION MEETINGS

63. The Commission was requested to review the organisation of Pre-Election Meetings, including but not limited to:
 - (a) Should Government be involved with/lead pre-election meetings?
 - (b) Optimum number, frequency and timing of pre-election meetings?
 - (c) Who should chair these meetings?
 - (d) Where should these meetings take place?
64. Prior to the Elections (Keys and Local Authorities) Act 2020 (2020 Act)³² election meetings were the domain of the Captains of the Parish, or the Mayor or Chairmen of Town Authorities. When, in the course of a political election, a formal request in writing by a body of electors in a parish was made to a Captain, arrangements would be made to invite all candidates to share a platform, usually under the chairmanship of the Captain in person. Occasionally, as, for example, when the Captain is a candidate, another suitable person, often a neighbouring Captain, was requested to take charge of the meeting. After the

³² <https://www.gov.im/media/1372237/electionskeysandlocalauthoritiesact2020-030621.pdf>

candidates had delivered short statements of policy, questions were invited from those present, the chairman deciding whether to accept only those from voters in the constituency concerned.

65. A detailed explanation of the status of requisition meetings was provided by HM Attorney General TW Cain CBE QC in response to a Tynwald question in March 1988.³³
66. The Select Committee on the Organisation and Operation of the General Election 2016-17³⁴ recommended that:

'A new system of pre-election meetings should be established so that meetings can be arranged and publicised well in advance as a matter of routine. Arrangements on the ground could be made by local authorities, Captains of the Parish or others but the overall responsibility for ensuring the meetings take place should lie with the Cabinet Office.'

Difficulties were understood to have occurred during the 2016 General Election in Onchan Parish where the Captain of the Parish had two constituencies and questions arose as to whether he could be required to host a requisition meeting for both parish electors and for parish electors whose homes fell with the Keys electoral district of Onchan.

67. The Select Committee recommendation made Government responsible for ensuring that a meeting takes place for every House of Keys election; both at the General Election and any by-elections. The Council of Ministers highlighted that, should this recommendation be approved, the Cabinet Office can only be responsible for ensuring that pre-election meetings are held on a constituency basis. Accordingly, these meetings would relate to constituencies and would not be held on sheading, parish or Local Authority basis.
68. Subsequently Section 63(3) of the 2020 Act³⁵ provided that it is the duty of the Returning Officer:
- a) to ensure that suitable arrangements are made to hold, for each national election,*
 - (i) one pre-election meeting per parish;*
 - (ii) one pre-election meeting for each of the following —*
 - (A) the four constituencies situated in the borough of Douglas; and*
 - (B) the towns of Castletown, Peel and Ramsey;*
69. During the 2021 General Election the Cabinet Office organised and funded this new system of public meetings. The intention was to ensure that all electors had an opportunity to find out more about their candidates and what they stood for before going to the polls.
70. Pre-election meetings were held in each of the Island's Parishes, plus the four Douglas constituencies and the towns of Castletown, Peel and Ramsey. The meetings took place from 7pm to 9pm, with doors opening at 6:30pm and seats allocated on a first-come first-served basis.

71. Meetings were held as detailed in the following table:

³³ <https://www.tynwald.org.im/spfile?file=/business/hansard/19802000/TC-19880315-v0105.pdf> - page T961

³⁴ [https://www.tynwald.org.im/spfile?file=/business/pp/Reports/2017-PP-0066\(1\).pdf](https://www.tynwald.org.im/spfile?file=/business/pp/Reports/2017-PP-0066(1).pdf) – page 10

³⁵ <https://www.gov.im/media/1372237/electionskeysandlocalauthoritiesact2020-030621.pdf>

Keys Constituency	Pre-election Meeting
Arbory, Castletown & Malew	Thursday 2 September - Arbory Primary School Tuesday 7 September - Castletown Community Hall Wednesday 15 September - Ballasalla Primary School
Ayre & Michael	Wednesday 1 September - Andreas Primary School Tuesday 7 September - Jurby Primary School Thursday 9 September - Ballaugh Parish Hall Monday 13 September - Sulby Primary School Thursday 16 September - Michael Primary School Monday 20 September - Bride Methodist Church Hall
Douglas Central	Tuesday 14 September - St Ninian's High School
Douglas East	Tuesday 14 September - Manx Museum Lecture Theatre
Douglas North	Thursday 16 September - Willaston Primary School
Douglas South	Thursday 16 September - Anagh Coar Primary School
Garff	Thursday 2 September - Dhoon Primary School Wednesday 8 September - Laxey Primary School Tuesday 14 September - Onchan Primary School
Glenfaba & Peel	Monday 6 September - St John's Primary School Thursday 9 September - Foxdale Primary School Wednesday 15 September - QEII High School
Middle	Wednesday 1 September - Marown Primary School Monday 6 September - Braddan Primary School Monday 13 September - Comis Hotel, Santon
Onchan	Wednesday 8 September - Bemahague School
Ramsey	Thursday 9 September - Bunscoill Rhumsaa
Rushen	Monday 13 September - Rushen Primary School

72. Less than a third of those who responded to the on-line consultation had attended pre-election meetings. Nearly 70% did not, with two persons stating they had been unable to attend due to disability or accessibility of the venue. Generally the majority of attendees who responded found the meetings useful in enabling them to see and listen to candidates in person, and a number of comments highlighted the usefulness of on-line video recordings of meetings and interviews with the candidates.
73. The meetings were not found useful by 17% of respondents. A variety of reasons were cited, including the number of candidates limiting the ability to ask many questions, focus on local matters, non-availability of manifestos, and the meetings being too short.
74. Discussion with elected candidates highlighted a number of issues, from the perspective of candidates, who in some instances felt the new format meetings were not so well attended as the old-style requisition meetings, that some venues were not suitable, there were accessibility issues, and that the advertising and organisation could be improved. Comments were also received generally about the number of pre-election meetings, noting

that in seven constituencies only one pre-election meeting was held, whereas four constituencies held three meetings and one constituency held six.

75. In addition to the formal pre-election meetings, at least one constituency held a requisition meeting at the request of electors. Local media organisations also hosted wide election coverage including electoral debates, candidate two-minute videos, candidate three question videos, and written interviews and constituency articles. These were presented across media channels including radio, print and digital media, other local platforms and YouTube. Government also hosted digital copies of manifestos issued by candidates on its website.
76. The wide range of meetings and media activity provides opportunity for the electorate to view and engage with candidates, however there is clearly a much greater commitment required when candidates in geographically larger constituencies, which incorporate more than one parish, have to attend multiple meetings and interviews arranged by a variety of organisations.
77. Cabinet Office representatives met with the Captains of the Parish following the 2021 Election; the meeting highlighted issues related to communication, suitability of venues, and timing of meetings. Concern was also expressed about the suitability of venues and comment made that the number of hustings was becoming unwieldy and off-putting.
78. The Commission noted the general view was that the former process of requisition meetings being organised by the Captains of the Parish, or their equivalent in Towns, had been better received with higher attendance than the new format pre-election meetings. This could have been due to a number of factors including the wide range of media coverage using a variety of channels.
79. It was noted in feedback that newspaper pull-outs, recorded meetings and candidate information and interviews available online and on the radio were all commended as enabling voters to effectively receive information about the election. Noting this positive feedback, **the Commission sees an opportunity for the Cabinet Office to signpost this information to the electorate in future elections to enable voters to make the most of the plethora of information available.**
80. Accepting the statutory requirement to ensure that meetings are held for every Parish the Commission felt that there remains an opportunity to engage better with the Captains of the Parish, and Chairmen of town authorities to undertake the organisation of Pre-Election meetings on behalf of the Returning Officer. This style of meeting it is felt would be better received by the electorate, and combined with improved advertising on local notice boards, through local authorities and on web and social media platforms, might generate more interest and engagement with the electorate.
81. The Commission refers back to the accessibility section and suggest that the **Cabinet Office and Captains of the Parish work together to ensure that venues used for meetings are, as far as practicable, accessible** noting that this is challenging in some parishes where public buildings are scarce.

Recommendation 8

Cooperation between the Cabinet Office, Local Authorities and Captains of the Parish be improved. While the statutory responsibility for organising pre-election meetings sits with the Returning Officer, this should be delegated to the Captains of the Parish or Local Authority with the agreement of the Cabinet Office, with the Cabinet Office meeting all reasonable expenses relating thereto.

POSTAL VOTING PROCEDURES

82. The Commission was requested to review postal voting procedures including but not limited to:
- (a) Was postal voting successful during 2021 General Election?
 - (b) Is this facility necessary?
 - (c) Could this process be improved?
 - (d) Should postal votes be permitted to be counted prior to election date?
83. The Commission is committed to improving accessibility to vote for those who may not be able to vote in person on Election Day, for example, students and others who are off Island, shift workers and those with caring commitments.
84. In the 2021 election, 2395 postal votes were processed which accounted for 4% of all votes cast. This was a significant increase on the 2016 election where half this number (1259) of advanced votes were cast.
85. The number of the postal votes processed per constituency is below:

Constituency	Number of Postal Vote Applications by Constituency¹
Arbory, Castletown and Malew	192
Ayre and Michael	207
Douglas Central	159
Douglas East	104
Douglas North	182
Douglas South	220
Garff	173
Glenfaba and Peel	263
Middle	163
Onchan	232
Ramsey	264
Rushen	236
Total Applications Made	2395

86. The on-line public consultation identified that a relatively small proportion of respondents (7%) exercised their vote by post at the last General Election. Over half of respondents would consider voting by post in future, while a quarter would not utilise this method of voting. This demonstrates potential for greater use of the postal voting option.
87. 21% of respondents were not aware that they could vote by post and therefore, **the Commission would suggest greater publicity of postal voting as an option.**
88. Respondents who voted by post by and large found the process straightforward to use with 86% of respondents confirming the process was simple to use. Only 7% had difficulty with the current process.
89. Feedback from DROs who administered the postal voting process was less positive with comments on the considerable time taken to issue postal voting packs and concerns around the time burden of verification of postal votes at the count, which was also mentioned by candidates.
90. The Commission has considered, and recommends, a number of alternatives to improve accessibility by voting in advance. The options are:
- a) making postal voting easier to administer (whilst not prejudicing the security of the voting process);
 - b) use of certifying officers;

POSTAL VOTE APPLICATIONS

91. The Application form for a Postal Vote at the 2021 election required the following steps from the voter:
- Register to vote if not on Register
 - Apply using application form (not on-line) (and register if not previously registered)
 - Post form to DRO
 - Receive back the verification form and ballot paper with envelopes
 - Complete and sign in two places on the verification form
 - Vote on ballot paper and put in envelope A
 - Put envelope A into envelope B with verification form
 - Return to DRO or deliver to relevant polling station on election day.
92. Not surprisingly (anecdotally from DROs and Members of Tynwald) voters often called at their DRO's office to collect forms to complete. The use of on-line application to be sent to the relevant DRO would no doubt assist in making the postal voting system easier to use for the voter.

93. The current process requires voters to apply for a postal vote by completing an application form which can be downloaded from the elections website or requested from a DRO in order to exercise their right to vote by post. In the public consultation, 44% of respondents stated that being able to register on-line for a postal vote would make it easier for them to vote.
94. Evidence from a number of DROs suggests that the administration process undertaken on receipt of a postal vote application took at least 10 minutes to process. Increasing the uptake of postal voting will increase the administrative workload for DROs. This being the case, making the process as efficient as possible is important to retain the support of DROs.
95. Each DRO must employ staff (either from internal or external resources) to process these applications for which there is no provision in the current payment structure for DROs. DROs may use their general power to delegate some of this onerous but important task which requires attention to detail, speed and accuracy. Some DROs use in house staff for a period of at least one month. It is a distraction to usual office tasks for DROs to utilise resources of their own offices so that in many cases additional staff must be employed at the DROs' own cost.
96. **Considering this evidence, the Commission feels it would be desirable for a process to be introduced by which an application for a postal vote can be made on-line and processed centrally. This would improve accessibility for voters and reduce workload for DROs but may have cost implications to central government.**

POSTAL VOTE VERIFICATION

97. Feedback from the last election from those attending the count was that the verification of postal votes at the count or earlier was cumbersome and time consuming. Whilst it is important that procedures to prevent electoral fraud must be built into the process, it should be noted that the in-person voting system does not require verification of a person's identity unless challenged.
98. **The verification of postal votes at the count could also be improved if verification were undertaken in advance of Election Day.** Candidates or Polling Agents should be invited to attend if they wish; the processed votes would then be lodged in a sealed ballot box to be opened at the count.
99. Discussions with DROs and the Cabinet Office identified that pre-verification sessions for postal votes would be beneficial and, ideally, should be implemented at the next election to reduce the time taken to verify postal votes on election night. In addition, the use of available technology should be investigated to speed up the verification process to enable scanned signatures to be compared with those on the Postal Vote Application Form.
100. The Commission recognises the benefits to accessibility of promoting postal voting and wishes to recommend future promotion of the postal voting system. We also recognise the disproportionate amount of work involved in administering postal votes in comparison

to in-person voting on Election Day. Therefore, any move aimed at increasing the volume of postal votes would need to be accompanied by additional support to DROs.

Recommendation 9

Cost effective methods be considered to streamline the postal voting process particularly through the use of technology and to further promote postal voting while considering appropriate support for Deputy Returning Officers.

CERTIFYING OFFICERS

101. In elections prior to 2021, Certifying Officers were appointed by a DRO in order to visit those who would be unable to vote in-person. This role was removed when postal voting was introduced at the last General Election as it was considered that postal voting would be a suitable alternative.
102. Anecdotal evidence was received from DROs and some Members of Tynwald that previously active voters resident in care homes did not participate to the degree they used to, partly due to mobility issues and partly due to the fact that they may have been unaware of the election itself. This could be attributed to the effect of Covid restrictions on care homes making communication more difficult.
103. Certifying Officers did not rank highly as an option to make voting easier in the on-line public consultation with only 8% of respondents identifying a home visit as an option that would make voting easier. However, the Commission is of the view that the likely users of such a service are unlikely to have completed the survey or attended public meetings. Although the Commission was unable to find statistics to support this assertion, reintroducing the role of a Certifying Officer would, we believe, generally be welcomed by residents of care homes wishing to exercise their right to vote. Some elderly persons are likely to find the process of applying for, and completing, the required verification form to be intimidating and confusing.
104. There was support from both DROs and Members of Tynwald that Certifying Officers, appointed centrally or by DROs, should be reinstated to avoid the potential disfranchisement of a considerable and previously active part of the electorate.
105. **The Commission recommends the reintroduction of Certifying Officers.** Such Officers could, at the request of the DRO or by application centrally, attend the physically disabled and elderly who met the criterion that it is not practicable for them to use any of the other voting options. This would potentially minimise disenfranchisement of a section of the voting population. Further, reintroducing the role of Certifying Officer may be welcomed by this group, who have historically been the most engaged in the voting process.
106. The Commission considers that the role of Certifying Officer would be to take the vote from the voter and convey it to the DRO. Certifying Officers could be employed directly by

Cabinet Office or by DROs on a temporary basis. The number of Certifying Officers and where they are needed should be determined by consultation between the Cabinet Office and the DROs. There will be cost implications but these are likely to be temporary and relatively low.

Recommendation 10

An appropriate number of Certifying Officers be appointed for cases where it is not reasonably practicable for a voter to make use of any other available voting options.

PROXY VOTING PROCEDURES

107. The Commission was requested to review the Proxy Voting Procedure, including but not limited to:

- (a) Was proxy voting successful during the 2021 General Election?
- (b) Is this facility necessary?
- (c) Can this process be improved?
- (d) Should there be any change to the deadline to apply for proxy voting?

108. Section 86 of the 2020 Act³⁶ and Schedule 3 of the Elections (Keys) Regulation 2021 (2021 Regulations)³⁷ as amended provide for Proxy Voting.

109. A person can only apply for a proxy vote in one of two circumstances; where they are required to leave the Isle of Man on urgent business or if they have a medical emergency. Currently, the deadline for requesting a proxy vote is 5pm the day before the election.

110. An eligible elector entitled to vote at an election who is unable to vote in-person or by post may apply to the Electoral Registration Officer for the appointment of a person as a proxy to vote for them at the election. The process requires the person requesting to appoint a proxy to provide an explanation as to why they are not able to vote in-person or by post.

111. The 2021 Regulations³⁸ extended the deadline for registered electors to apply for a proxy vote from 5pm on day 36 of the election process to 5pm on day 41 of that process. This was intended to prevent electors from being disenfranchised in certain unforeseen circumstances.

112. The Commission was advised that, during the 2021 General Election, a total of 213 applications to appoint a proxy were made across all Constituencies. This compares to 146 in the 2016 General Election. A total of 157 proxy votes were cast in 2021. This was 0.27% of the vote.

113. In-person discussions raised minimal concerns regarding the Proxy voting system, except for a difficulty due to a delay experienced in the issuing of an updated Electoral Register on

³⁶ <https://www.gov.im/media/1372237/electionskeysandlocalauthoritiesact2020-030621.pdf>

³⁷ https://legislation.gov.im/cms/images/LEGISLATION/SUBORDINATE/2021/2021-0096/ElectionsKeysRegulations2021_2.pdf

³⁸ <https://www.tynwald.org.im/business/opqp/sittings/20182021/2021-SD-0233.pdf>

polling day. During the public meetings the general view expressed, where discussed, was that the proxy system worked satisfactorily.

114. There was little comment made on the proxy voting system in public meetings. Only three of the public consultation respondents stated that they had appointed a proxy during the 2021 General Election. Of respondents, 63% felt that the present system and deadline to submit applications to appoint a proxy should remain as is, whereas 26% felt that the deadline to submit applications to appoint a proxy should be extended. Others did not express a preference either way.
115. The Commission noted that the appointment of a proxy requires the issuing of a proxy certificate and felt that it would be administratively unreasonable to expect such process to operate beyond the existing deadline. The Commission feels that the introduction of an electronic Electoral Register for use during the election process and on Polling Day would speed the process of provision of the up-to-date Electoral Register and should mitigate against any concerns related to the accuracy of that document.
116. **The Commission has reviewed the evidence and is not recommending any change to the Proxy Voting System as it presently operates.**

TRAINING FOR DEPUTY RETURNING OFFICERS AND ELECTION STAFF

117. Although not in the Tynwald resolution, the benefit of training was identified consistently in our discussions and was also a recommendation of the CPA. The Commission would like to emphasise the positive recognition within the CPA BIMR report³⁹ concerning the advantage to the Island in having the benefit of committed, knowledgeable and experienced DROs. The work of the DROs and their election staff is critical to the effective and fair running of general elections, the cornerstone of the democratic functioning of the Isle of Man.
118. Delivering this service on behalf of the Manx public is a significant undertaking, but, aside from very occasional by-elections, takes place only once every five years. Consequently, the process relies heavily on the experience of the DRO and their staff, the interpretation by each DRO of the relevant electoral legislation and guidance provided by the Cabinet Office. This was noted in the CPA BIMR report⁴⁰:

“Training for DRO, who are responsible for the conduct of their constituency election, appears to be limited, and the interpretation of the legal framework for elections is

³⁹ <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

⁴⁰ <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

determined by individual DROs. This led to regulations being implemented differently across constituencies, although this did not seem to affect the integrity of the electoral process as a whole” and;

“There was some variation in the application of the regulations, and the Mission observed some instances of family voting, where voters use the same polling booth, that were not challenged by polling station staff.”

119. As a result, the CPA BIMR⁴¹ recommended systematic training for DROs and for polling station staff, to ensure consistent Implementation of legislation and consistent delivery of elections across the Island. Half of Tynwald Members who engaged directly with the Commission raised issues concerning the clarity and/or consistency of the Election Rules and their application. Responses received from the public, including from the on-line public consultation, also suggest that training would be beneficial in many areas, such as supporting those with accessibility needs.
120. The Commission, whilst acknowledging that it will involve a significant effort, considers that a manual should be produced to ensure that all key electoral processes are identified and comprehensively documented and that training materials are produced for the use of DROs and election staff. This would be considerably beneficial to both DROs and to election staff to provide clarity and ensure fairness through the consistent application of rules and processes across the Island.
121. The manual should be compiled under the direction of the Returning Officer and with input from the DROs. It should be reviewed and updated as required, using feedback from DROs, their staff and other stakeholders and keeping track with progress in standards in international best practice where these are deemed relevant to the Isle of Man.
122. With a manual in place, training materials can be tailored to address key elements of the election process. However, further work is needed to ensure that all staff involved in delivering elections, in particular the DROs and Polling Station Presiding Officers, can access and benefit from training. This could involve for example a dedicated training resource and on-line resources, noting that this would incur costs. Opportunities to provide formal and practical recognition for involvement in delivering elections also need to be explored further.
123. The Cabinet Office should also investigate the feasibility of establishing a small pool of trained staff who can be called upon by DROs on the day of the election to supplement their staff where required.

⁴¹ <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

Recommendation 11

All key electoral processes be identified and comprehensively documented by the Returning Officer in a manual and training materials produced for the use of Deputy Returning Officers and election staff. Incentives should be explored to encourage Deputy Returning Officers and election staff to participate in training in advance of polling day.

ABILITY TO VOTE AT ANY POLLING STATION ACROSS A CONSTITUENCY

124. A pilot scheme was run in the constituency of Douglas South in the September 2021 election allowing people to vote in any polling station within their constituency (Douglas South pilot).
125. The Commission was requested to review the ability to vote at any polling station within a constituency, including but not limited to:
- (a) Was the pilot scheme in Douglas South successful?
 - (b) Should the scheme be rolled out across all the constituencies?
 - (c) Could the scheme be improved?
 - (d) Should live activity data be made available so voters could view how busy each polling station is?
126. Section 61 of the 2020 Act⁴² provides that Cabinet Office may, after consultation, by order approved by Tynwald, divide any constituency into two or more polling districts. Unless an order is made in respect of a constituency, the whole constituency constitutes a single polling district. The Returning Officer must ensure that there is a polling station for each polling district. The Cabinet Office must conduct a review of polling districts two years before each scheduled national election.
127. The constituency of Douglas South is comprised of three polling districts which, for the House of Keys General Election 2021, had polling stations provided at the following locations:

Douglas South	CDGS1	Pulrose Methodist Church, Pulrose Road, Pulrose, Douglas
Douglas South	CDGS2	Anagh Coar Primary School, Darragh Way, Anagh Coar, Douglas, IM2 2BA
Douglas South	CDGS3	Scoill Vallajeelt, Meadow Crescent, Braddan, IM2 1NN

⁴² https://legislation.gov.im/cms/images/LEGISLATION/PRINCIPAL/2020/2020-0014/ElectionsKeysandLocalAuthoritiesAct2020_3.pdf

128. Procedures set down on the 2021 Regulations⁴³ provide that when a voter has been issued with a ballot paper, either by post or at the polling station, a mark must be placed on the Electoral Register used at the polling station to denote that a ballot paper has been received. This process is intended to ensure that each voter has only one ballot paper issued to them. This requires each polling district to hold its own distinct extract of the Electoral Register.
129. Whilst, in previous elections, voters have been assigned a designated polling station, for the 2021 General Election, in the constituency of Douglas South voters, although still assigned a polling station, were able to use any polling station in the constituency. The system was introduced as a trial, and it was hoped that it would allow people to choose the best location for them to cast their votes around work and family commitments.
130. It is interesting that the constituency of Douglas South was the only Island constituency which recorded a notable increase in voter turnout at the 2021 General Election as illustrated in the table below.

	2016	2021	% Points
	turnout	Turnout	change
Castletown & Malew	60%	56%	-4%
Ayre & Michael	65%	62%	-3%
Douglas Central	49%	43%	-6%
Douglas East	40%	36%	-4%
Douglas South	40%	47%	7%
Garff	50%	51%	1%
Glenfaba & Peel	56%	57%	1%
Middle	52%	51%	-1%
Onchan	49%	45%	-4%
Ramsey	61%	54%	-7%
Rushen	59%	58%	-1%

131. The ability to vote at any polling station within a constituency, rather than at one designated to a voter, presented the challenge of ensuring that voters who had been issued with a ballot paper at one polling station were not then able to obtain a second ballot paper by presenting at another polling station. To address this, a system was introduced based on “live” digital Electoral Register for each of the polling districts within the constituency. This live data was accessed and maintained via an iPad used at each polling station as well as the usual manually marked Electoral Register as a backup in the

⁴³ https://legislation.gov.im/cms/images/LEGISLATION/SUBORDINATE/2021/2021-0096/ElectionsKeysRegulations2021_2.pdf

event of any technological failure. Voters had been warned that, if problems arose, they may have to go their original designated polling station to cast their vote.

132. The process was specifically referenced in the CPA BIMR report⁴⁴. The report concluded that:

“The pilot project appears to have been a success, based on the Mission’s polling day observations. The system was easy to use for staff and numerous voters attended polling stations that were not their originally designated one. The Mission was informed that the pilot had identified voters who had been issued with postal votes and therefore could not vote in-person at a station, which gave evidence that the process functioned well. Staff coordinating the technology supporting the on-line process reported no errors or failures of the system during polling day. This pilot could be extended in the future, opening up the opportunity to voters to vote in any polling station in their own constituency, or even across the island.”

133. Discussions with the DRO for the constituency of Douglas South confirmed this assessment. Each of the polling stations had maintained their own registers and been able to record when a voter had chosen to vote at a non-designated polling station with the other stations being able to see the record on the Electoral Register and receive notification when this occurred. The system was very much a ‘soft launch’ and other than some prior media coverage no formal commentary on its introduction was given. Voters still received a polling card notifying them of their normal polling station.
134. Within the public consultation, the Commission asked whether voting would be made easier or would respondents have been more inclined to vote if a choice to vote at any of the polling stations in the voter’s constituency existed. Over a third of respondents to the on-line public consultation agreed it would.
135. Discussion with Members of Tynwald supported the view that the ability to vote at any polling station within a constituency would be beneficial.
136. The Commission spoke to staff of the Government Technology Services (GTS) who advised that the system implemented in Douglas South had been developed sufficiently to be utilised within any individual constituency. The application within Douglas South had proved a successful test, and it could easily be used in other or all constituencies at the next general or by-election with the same safeguards in place.
137. There may be further opportunities to utilise this process, for example, to share information on the numbers of voters having voted and near real time data on polling station traffic. These should be explored with GTS.
138. The Commission believes that the trial was successful, as shown by an increased turnout in 2021 of 17% over the 2016 turnout, and the facility was generally supported despite the fact that publicity during 2021 was fairly low key.

⁴⁴ <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

139. **The Commission concluded that the ability to allow voters to vote at any polling station within their constituency should be implemented across all constituencies forthwith.** In doing so there should be prepared clear and unambiguous instructions, in the form of procedure manuals, for election staff and a training process put in place to ensure that all staff are clear on the operation of the system.
140. The move will mean that electoral registers utilised for future elections will effectively be in digitised format, which as previously discussed will it is felt ease the path towards further digitisation of processes for future elections.

Recommendation 12

The ability to allow voters to vote at any polling station within their constituency be implemented across all constituencies forthwith.

THE FEASIBILITY OF SETTING UP ONE OR MORE "ALL ISLAND" POLLING STATIONS

141. The Commission was requested to consider the feasibility of all-Island voting stations, including but not limited to:
- (a) Should there be a facility for votes to be cast for any constituency in various locations around the island?
 - (b) Would transferring ballot boxes around the island pose any significant risk to the integrity of the electoral process?
 - (c) Would any of the other options considered above (points 5, 6 and 7) be preferable to all-island voting facilities?
142. The initial consideration of this issue focused on this facility being provided on polling day.
143. There are a number of aspects of the electoral process which would require review in the event that all-Island voting was to be permitted. The challenge to this proposal is the continued reliance upon a paper ballot system in that, at present, each of the methods available for casting a vote relies upon the use of a physical ballot paper. Opening up polling stations to allow a voter to cast their vote for their own constituency anywhere on the Island on polling day, therefore presents logistical challenges including but not necessarily limited to:
- The Electoral Register for all constituencies would need to be provided at every polling station on the Island, and a reliable process for ensuring that these registers were continuously updated, with live data would require to be implemented and maintained. It was noted that the trialled live register system was designed to work within single constituencies only.

- Ballot papers for every constituency would need to be made available at every polling station on the Island.
 - Consideration would be needed as to the provision of more polling booths in areas where additional footfall from other constituency voters might occur (most likely at polling stations in town areas.)
 - A ballot box for every constituency, 12 in total, would be required at every polling station throughout the Island. Election staff would require to be provided with appropriate training and measures put in place to ensure that ballot papers are placed in the correct ballot box, which would present a substantial risk to the integrity of the electoral process.
 - Provision would need to be made for election agents to be able to access every polling station throughout the Island, to witness and satisfy themselves as to the proper administration and secrecy of the ballot.
 - Arrangements would need to be made to transport each sealed ballot box to its appropriate counting station after the close of the polls. Counting would not be able to commence until all ballot boxes for a constituency had been accounted for, this would create unavoidable delay to the count process.
 - Agreement would be needed as to how DROs and election staff would manage the process particularly as some polling stations might experience a significant increase in voter use.
144. In light of the above, the Commission felt that so long as the polling process remains exclusively a paper ballot it would be impractical to allow voters to vote at any polling station throughout the Island on polling day.
145. A better opportunity to enable all Island voting to be undertaken would be presented if an on-line voting facility could be introduced.
146. Voters do of course have the opportunity to vote without attending a polling station by using the postal voting system. This system presents an advantage to voters in that it can be used at any time in the week prior to polling day, and in addition voters can deliver a postal ballot to any polling station in their constituency at any time on polling day itself. Voters can apply for a postal vote at any time following the Notice of Election up to seven days before polling day.
147. Discussion with DROs highlighted that some voters at the 2021 election completed their postal ballot application at the office of their DRO and returned their ballot papers to that address by hand rather than using the postal system. It is possible that some voters would prefer to hand deliver their ballots directly to the office of their DRO rather than placing trust in the postal system.
148. The Commission feels that the present postal voting system presents an opportunity for voters to cast their ballot during the period leading up to polling day, but it might be practicable to operate a central postal voting office, or regional offices where any voter could deliver their vote for any constituency. This might provide a larger window of

opportunity for the electorate to vote as well as providing the opportunity to vote outside the constituency, which may be beneficial for voters who work in different areas.

149. **The Commission suggests that the Cabinet Office investigate the provision of a central postal voting facility.**

CANDIDATE CAMPAIGN MATERIALS

150. The Commission was requested to review Candidate Campaign Materials, including but not limited to:

- (a) Could the authority to display campaign materials be streamlined?
- (b) Is there clear and appropriate guidance on campaign materials and their display on public land?
- (c) Is there consistent and effective enforcement of campaign material rules?

151. Election Candidates are provided with a range of information published on the Government website including a general Guidance for Candidates document⁴⁵, a Code of Conduct for tellers,⁴⁶ and persons casually in attendance at a polling station⁴⁷; and Guidance on Election Funding⁴⁸, together with copies of the relevant legislation.

152. The documentation provided appears to be comprehensive and to provide clear guidance which candidates should be able to adhere to, although there is a degree of ambiguity where the guidance specifies a maximum size of any election material to be displayed on a public highway as 15" x 24" (38 cm x 61 cm) whereas reference is also made to the use of banners which, by their nature, will exceed those size limits.

153. Within the consultation document the Commission asked whether people considered that there is consistent and effective enforcement of the rules that exist in relation to campaign materials? Of 191 respondents, 15% felt that there was not effective enforcement, 30% that there was, 52% did not know and 3% did not answer the question.

154. Discussions with elected representatives highlighted a feeling that there had been a lack of consistency in enforcing the Code of Practice in relation to election materials, with some instances of election posters having been vandalised, defaced or destroyed. The subject was referenced in the report⁴⁹ of the CPA BIMR. Worrying reports were received of women candidates being specifically targeted in their campaign, with their posters defaced or destroyed. Some women candidates also reported being subjected to gender-based attacks on social media.

155. The Commission concluded that there should be a more consistent process for enforcement and dealing with complaints raised about campaign material. This would be better served by the appointment of a designated officer to whom all requests for advice or

45 <https://www.gov.im/media/1371853/guidance-for-candidates-general-election-2021-300421-v2.pdf>
<https://www.gov.im/media/1372958/code-of-practice-in-respect-of-election-materials-2021-110521.pdf.pdf>

<https://www.gov.im/media/1371854/guidance-from-the-information-commissioner.pdf>

46 <https://www.gov.im/media/1373036/code-of-conduct-for-tellers-and-volunteers-2021.pdf>

47 <https://www.gov.im/media/1373036/code-of-conduct-for-tellers-and-volunteers-2021.pdf>

48 <https://www.gov.im/media/1371855/guidance-on-election-funding-2021-270521.pdf>

49 <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

complaints would be addressed, and the provision of an appropriate appeals mechanism against a decision. This would avoid inconsistencies and confusion in interpretation of the rules by DROs.

Recommendation 13

The process for making complaints about damage, defacement and removal of election materials and any other relevant matters be set out by the Returning Officer. Clear guidance should be available as to whom a complaint should be made and the actions that can be taken by the relevant authority.

GLOSSARY

Abbreviation	Term	Description
	Captain of the Parish	The Captain of the Parish is an honorary office in each parish in the Isle of Man made by appointment by the His Excellency the Lieutenant Governor — traditionally Captains of the Parish have called requisition meetings prior to elections.
CPA	Commonwealth Parliamentary Association	This is a membership group for legislatures promoting the positive ideals of parliamentary democracy.
CPA BIMR	Commonwealth Parliamentary Association British Islands and Mediterranean Region	The CPA sent a ‘Mission’ of election observers from the British Islands and Mediterranean Region to observe the 2021 Isle of Man General Election. Their findings were formalised and published in a report ⁵⁰ .
DRO	Deputy Returning Officer	The Returning Officer delegates responsibility for the administration of elections to Deputy Returning Officers. A Deputy Returning Officer is appointed for each constituency and has authority for the administration and operation of the election.
	Electoral Register	An official list of the people who are entitled to vote in an election.
	Equality of representation	All voters having the same number of votes.
	Equivalency	Each constituency having as close to the average population as is possible.
	Polling District	A polling district is a geographical sub-division of an electoral constituency. In the Isle of Man legislation provides that each constituency is divided into a number of polling districts for the administration of elections, each of which must have a polling station.
	Presiding Officer	The Presiding Officer is responsible for the operation of a particular polling station on election day who has responsibility for all the polling stations in the constituency.
	Requisition Meeting	This is the historic name for pre-election meetings traditionally called by Captains of the Parish.

⁵⁰ <https://www.uk-cpa.org/media/4422/final-report-cpa-bimr-election-observation-mission-to-isle-of-man-2021.pdf>

	Returning Officer	The Returning Officer is the accountable officer in the legislation for elections, presently the Chief Executive of the Cabinet Office.
	Variance	Departure from the average constituency size (which in the Isle of Man is currently +/-15%).

Appendix 1 – Electoral Commission Remit 2022

The Resolution

A resolution of Tynwald requires that in addition to reviewing the number and boundaries of constituencies (which will include the number of seats per constituency) the Electoral Commission must consider and produce a report to Tynwald on the following matters:

1. Accessibility of elections to voters;
2. The organisation of Pre-Election Meetings;
3. Postal voting procedures;
4. Proxy voting procedures;
5. Ability to vote at any polling station across a constituency;
6. The feasibility of setting up one or more "All Island" Polling stations;
7. Candidate campaign materials;

and in doing so shall have due regard to the Commonwealth Parliamentary Association Benchmarks for Democratic Legislatures and to the potential costs of its recommendations.

Points for consideration

As approved by a Resolution of Tynwald, the Electoral Commission will produce a report for Tynwald, no later than 18 months after appointment, detailing their findings as a result of the following considerations, which should not be considered to be exhaustive.

1. Review the number and boundaries of constituencies including the number of members per constituency, including but not limited to:
 - a. Size and population of constituencies – are current boundaries appropriate? Is representation fair and equitable?
 - b. Should population be the sole guide to constituencies and boundaries?
 - c. Should there be a change to the number of constituencies?
 - d. Are two seat constituencies working?
 - e. Would single seat constituencies work better than constituencies having two or more seats?
 - f. Could duplication of work be avoided in constituencies having two or more seats?
2. Accessibility of elections to voters, including but not limited to:
 - a. Review of the 2021 General Election and how well it complied with the Equality Act?
 - b. Should there be any mandatory venue attributes identified for future voting locations?
 - c. Are there any additional accessibility measures which should be incorporated into future election planning and administration?
3. The organisation of Pre-Election Meetings, including but not limited to:
 - a. Should Government be involved with/lead pre-election meetings?
 - b. Optimum number, frequency and timing of pre-election meetings?
 - c. Who should chair these meetings?

- d. Where should these meetings take place?
4. Postal Voting procedure, including but not limited to:
 - a. Was postal voting successful during 2021 General Election?
 - b. Is this facility necessary?
 - c. Could this process be improved?
 - d. Should postal votes be permitted to be counted prior to election date?
 5. Proxy Voting procedure, including but not limited to:
 - a. Was proxy voting successful during 2021 General Election?
 - b. Is this facility necessary?
 - c. Could this process be improved?
 - d. Should there be any change to the deadline to apply for proxy voting?
 6. Ability to vote at any polling station across a constituency, including but not limited to:
 - a. Was the pilot scheme in Douglas South successful?
 - b. Should the scheme be rolled out across all the constituencies?
 - c. Could the scheme be improved?
 - d. Should live activity data be made public so voters could view how busy each polling station is?
 7. Feasibility of All-Island voting stations, including but not limited to:
 - a. Should there be a facility for votes to be cast for any constituency in various locations around the island?
 - b. Would transferring ballot boxes around the island pose any significant risk to the integrity of the electoral process?
 - c. Would any of the other options considered above be preferable to all-island voting facilities?
 8. Candidate Campaign Materials, including but not limited to:
 - a. Could the authority to display campaign materials be streamlined?
 - b. Is there clear and appropriate guidance on campaign materials and their display on public land?
 - c. Is there consistent and effective enforcement of campaign material rules?

Appendix 2 – Biographies of Commission Members

CHAIR

SALLY BOLTON | DIRECTOR AND ADVOCATE

Sally has been qualified as an Advocate since 1990 and is qualified as a Barrister at the English Bar. She was a Founder Member of Corlett Bolton & co. Advocates in 1992 and continues as a Director of that firm.

Sally's professional areas include all areas of family law, including Estates, Inheritance and private client work, but she can also turn her hand to land or litigation if the need arises.

In the course of her professional life Sally has acted as (Deputy) Returning Officer for Peel (and now Glenfaba & Peel) since the 1990's and she chaired the Boundary Review Committee between 2011 – 2013 which resulted in the redrawing of the boundaries of the Island's Electoral Constituencies in 2013 and setting the democratic principles which Tynwald adopted and currently operates.

In 2012 Sally was presented with the Deemster Kerruish Endeavour award for her work in promoting professional services through the Institute of Directors (IoD) and in Family mediation and has previously acted as Chairperson of the Isle of Man branch of the Institute of Directors and is actively involved in the work of a number of local charities.

MEMBERS

MICHELLE NORMAN

Brought up and educated on the Island, Michelle gained an LLB (Hons) degree at the University of Buckingham and then trained with local firm, Dickinson Cruickshank & Co, being called to the Manx Bar as an advocate in April 1993.

After cutting her teeth in general practice, she took up a post as a prosecutor in the Attorney General's Chambers in 1995. Michelle later moved into a general advisory role, supporting the Attorney General in the delivery of his statutory functions and providing legal advice and representation to various entities within the Isle of Man Government, including on matters relating to elections.

She retired from practice in June 2021, the highlight of the last few years of her career being the delivery of a project to update the Island's charity law, including leading on the policy development and drafting the necessary primary and secondary legislation. Since retiring, Michelle has been appointed as the Vice Chair of the Road Transport Licensing Committee and as the Island's Police Complaints Commissioner.

KAREN RAMSAY

Karen has worked in a number of professional fields including anti-money laundering, international and constitutional relations and education. Prior to becoming Head of Policy for Anti Money Laundering, a position from which she retired in October 2021, Karen worked on crown and external relations matters.

As Senior External Relations Officer in the Cabinet Office from 2011 - 2014, Karen led a review of the 2011 General Election and the introduction of subsequent legislative amendments.

She worked with the Boundary Review Committee, supporting and coordinating the parliamentary progress of its reports and recommendations. Karen has also worked in the Isle of Man Constabulary as Director of Corporate Services and previously has held roles in the third sector and within UK local government.

PETER WHITEWAY

Peter Whiteway retired as Town Clerk and Chief Executive of Ramsey Town Commissioners in December 2021. During his 19 years in that office he served as Election Clerk to the Returning Officer for over 10 local authority elections.

Prior to joining the local authority he was employed in central government, he has experience in project management, policy development and legislative reviews. Outside work he is Chairman of the Ramsey Branch of the Royal National Lifeboat Institute, a Trustee of Ramsey Town Band, a Member of the Management Committee for Ramsey Citizen Advice Service, a member of the IOM Education Council, and a member of the Island's Planning Committee.

NIGEL DAVIS

Nigel Davis is an experienced senior international business leader, who joined the Coca-Cola business in 1994. His career developed progressively within the Ukraine and Belarus businesses, having successfully completed assignments as CFO of both operating units. In 2001, Nigel was appointed Country General Manager in Belarus.

In 2005, Nigel assumed the position of Country General Manager Bulgaria, where he captured market share, acquiring and integrating a water business, whilst going live with a major SAP implementation.

In 2012, Nigel was appointed as Group Chief Information & Process Officer, a new group role in which he successfully brought together the Information Technology and Business Process Functions, completed the implementation of SAP and delivered a new Data Centre, always driving value with continuous focus on service and cost leadership.

In 2016, he became Country General Manager of Switzerland. In 2020 he stepped back from the corporate world and has been consulting to various small businesses, is Chair on the Isle of Man Meat Company and a Trustee of St. Christopher's Fellowship.

Nigel has a Bachelors' degree in Biology and Chemistry from the University of London and is a member of the Institute of Chartered Accountants in England and Wales.

Appendix 3 – Engagement Register

Commission would like to thank all those who took the time to respond in writing or to meet in person to share their views and experience. For confidentiality reasons we are not publishing names.

MHKs/MLCs

Invitations were issued to all with the option to speak to the Commission in person and/or to provide a written response to a list of questions that were issued to them. The questions were centred on the Tynwald resolution areas and further discussion was directed by members.

Deputy Returning Officers

Invitations were issued to all of those that had worked on the last election as DROs in order to obtain separate feedback / views on the processes that linked in with the Commission's remit to that received by the Crown and Elections Team immediately after the election. An in-person discussion session was held.

Government Departments

The Electoral Commission invited representatives from Government Departments to assist them in their work including the following:

- Planning Policy (Cabinet Office)
- Mapping (Department of Infrastructure)
- Government Technology Services (Cabinet Office)
- Crown and Elections (Cabinet Office)
- Clerk of Tynwald's Office
- Department for Education, Sport and Culture

Other

Feedback was sought around all aspects of the Commission's work from external bodies and organisations that have/had experience with elections on the Island or activities connecting to the elections. These included groups that have knowledge or experience of matters that may impact the accessibility of elections to voters. All were invited to contribute to the work of the Commission and provide views. The groups include the following:-

- Local Authorities
- Captains of the Parish
- Council of Voluntary Organisations (Representing IOM Charities)
- DOI Accessibility Steering Group
- One World Centre / Café Lingo
- Minority Group Associations
- Isle of Man Islamic Association

- Youth engagement via Secondary school 6th forms – Ballarkermeen High School; Castle Rushen High School; King Williams College; Ramsey Grammar School; Queen Elizabeth II High School; St Ninian’s High School
- Manx Radio
- Mi-voice – technology provider for on-line election systems
- Welsh Local Government Elections Division

Public Consultation

The Electoral Commission undertook a public consultation exercise to obtain the views of as many individuals on the Island about the matters under consideration. This exercise was issued via the consultation hub and ran from the 23rd May 2023 to the 28th July 2023.

In addition, the Commission held public meetings in:

- Ramsey Town Hall
- Onchan/ Douglas St Andrew’s Church
- Arbory Parish Hall
- Peel Corrin Hall

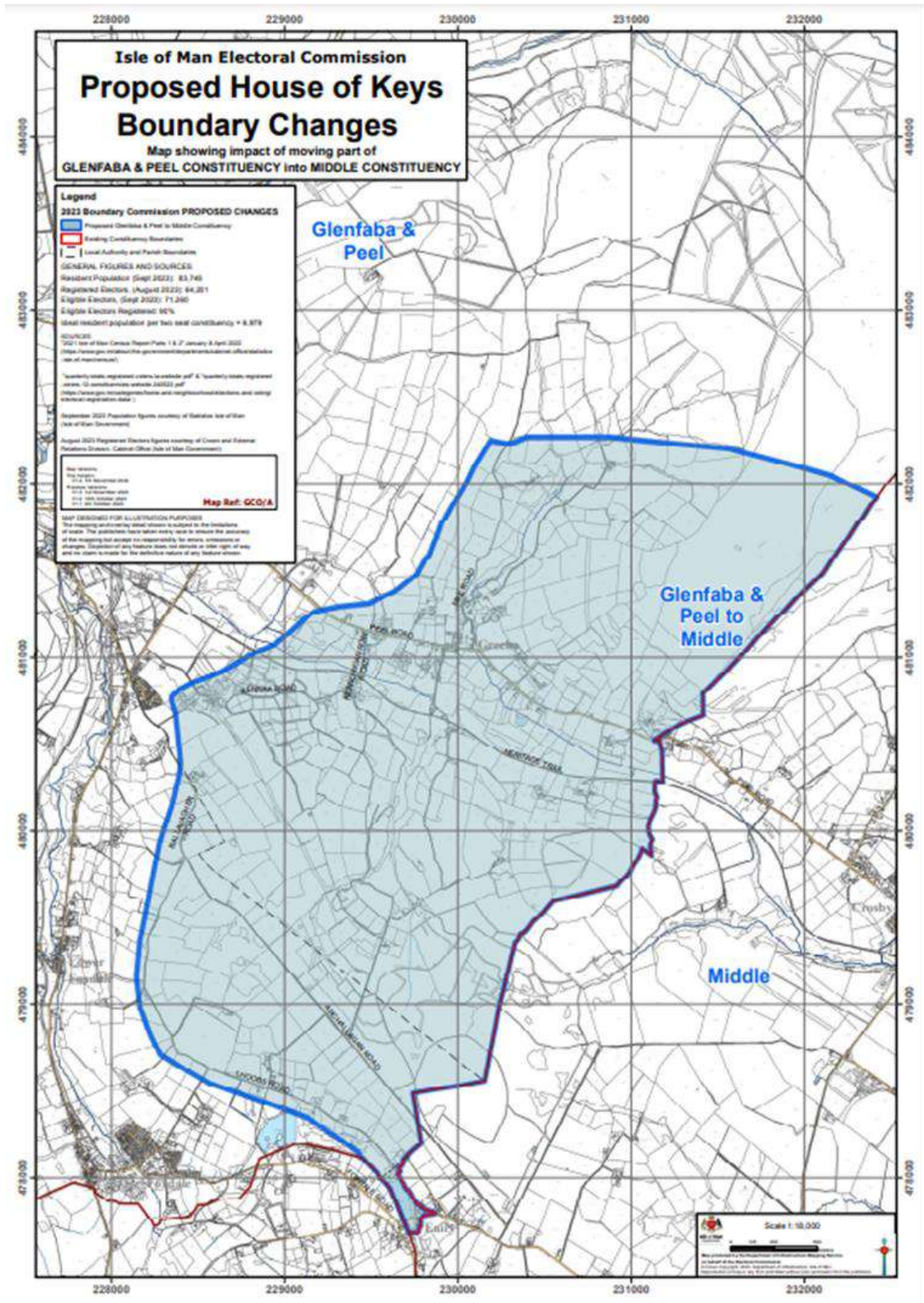
Whilst none of the meetings were particularly well attended those who did attend had the opportunity to air a wide range of views and the Commission was able to explain principles and hear comment, experiences and ideas.

A further consultation exercise was run from 9th November to the 15th December 2023 to obtain feedback on the options for proposed boundary changes. This consultation involved publication of proposed changes on the Commission website, media coverage of proposed changes and meetings with political representatives in affected areas including face to face meetings with constituency MHKs and local government representatives.

Appendix 4 - Boundary Review General Figures

Electoral Commission		General figures before suggested moves				General figures after suggested moves				Variation from 6,979 (optimum population per constituency)	
Constituency	Population	16 and Over Population	Number of registered electors	Percentage registered	Variation from 6,979 (optimum population per constituency)	Constituency	Original Population	Plus / Minus	"new" Population	Variation from 6,979 (optimum population per constituency)	
Arbory, Casterown & Malew	7,542	6,385	5,996	94%	108%	Glenfaba & Peel	8,240	-284	7,956	114%	Figures after moving part of Glenfaba & Peel out of Constituency
Ayre & Michael	6,319	5,501	5,086	92%	91%	Middle	6,276	284	6,560	94%	Figures after moving part of Glenfaba & Peel into Constituency
Douglas Central	7,198	6,122	5,302	87%	103%						
Douglas East	6,580	5,900	4,837	82%	94%	Ramsey	8,276	-414	7,862	113%	Figures after moving part of Ramsey out of Constituency
Douglas North	6,367	5,243	4,708	90%	91%	Ayre & Michael	6,319	414	6,733	96%	Figures after moving part of Ramsey into Constituency
Douglas South	6,579	5,418	4,851	90%	94%						
Garff	6,487	5,599	5,235	93%	93%	Ramsey	8,276	-680	7,596	109%	Figures after moving part of Ramsey out of Constituency
Glenfaba & Peel	8,240	6,876	6,296	92%	118%	Garff	6,487	680	7,167	109%	Figures after moving part of Ramsey into Constituency
Middle	6,276	5,200	4,788	92%	90%						
Ondrian	6,624	5,639	5,089	90%	95%						
Ramsey	8,276	7,135	6,228	87%	119%						
Rushen	7,257	6,242	5,805	93%	104%						
Totals	88,745	71,260	64,201	90%	N/A						
Average per Constituency	6,979	5,938	5,350								
Part of Glenfaba & Peel Constituency being moved into Middle Constituency (area bounded by blue line on map), estimated population: 129 x 2.2 = 284											
Part of northern Ramsey Constituency to move into Ayre & Michael Constituency (area bounded by blue line on map), estimated population: 188 x 2.2 = 414											
Part of southern Ramsey Constituency to move into Garff Constituency (area bounded by blue line on map), estimated population: 309 x 2.2 = 680											
VERSIONS											
This version: 1.4, 7th November 2023 (unchanged from v1.3)											

Appendix 5 - Proposed House of Keys Boundaries for Glenfaba & Peel



Appendix 7 - Proposed House of Keys Boundaries for South Ramsey

