

STANDARDS, PROCEDURES AND PUBLIC APPOINTMENTS COMMITTEE

SCOTTISH GENERAL ELECTION (CORNOAVIRUS) BILL

WRITTEN EVIDENCE FROM DR. ALISTAIR CLARK AND PROFESSOR TOBY S. JAMES

1. Alistair Clark's expertise is in electoral integrity and administration, with several published research articles and reports on these themes, including on the passage of the Referendums (Scotland) Act 2020, and on the potential effect of the COVID-19 pandemic on the Scottish parliament election (<http://www.ncl.ac.uk/gps/staff/profile/alistairclark.html#background>).¹ Toby James is the co-convenor of the Electoral Management Network and has published widely on the management of elections, including most recently on election postponement. We have been funded by the UK's Economic and Social Research Council to undertake research into the effect of COVID-19 on electoral processes.² Case studies and analysis from around the world are being published at: <http://www.electoralmanagement.com/covid-19-and-elections/>. We write in a personal capacity.

General Aims

2. The Policy Memorandum indicates that 'The Government's overall aim is to ensure that the election will be held as planned on 6 May 2021 with 'in-person' voting supported by appropriate physical distancing measures and a substantial increase in numbers of people voting by post' (para 6). We support this broad policy aim, although we outline issues with the Bill's proposals and process below.

3. We naturally acknowledge the uncertainty in which election practitioners (EMB, Electoral Commission, ROs, EROs etc.) are having to plan next year's Scottish parliament elections. Election administrators are working under difficult circumstances and should be complemented for the efforts and consideration they are putting into doing so, and also for their efforts in running local council by-elections, earning some much-needed experience of elections under COVID-19 circumstances.

Timing and Scrutiny

4. A key principle of electoral integrity is that there is stability in the rules and procedures of the election, so that candidates, parties and voters are certain about the 'rules of the game' and can prepare accordingly.³ Good practice in conducting electoral processes indicates that legislation must be passed well in advance of the

¹ <https://spice-spotlight.scot/2020/06/30/coronavirus-covid-19-what-could-the-impact-be-on-the-ordinary-general-election-to-the-scottish-parliament-scheduled-for-may-2021/> Views expressed are Clark's own.

² National Recovery and Resilience: Learning from Elections During a Pandemic, ES/V015443/1. See: <http://www.electoralmanagement.com/covid-19-and-elections/>.

³ James, T.S. and Alihodzic, S. (2020) 'When is it democratic to postpone an election? Elections during natural disasters, COVID-19 and emergency situations', *Election Law Journal*, 19(3), pp. 356-7.

electoral event that legislation regulates. The Council of Europe's Venice Commission suggests a 12-month period, while the Gould Report into Scottish election difficulties in 2007 indicated a six-month period.⁴

5. Gould recognised that constructive engagement with stakeholders would be central to improving Scottish electoral practice. Research has shown that Scottish electoral administration has since performed commendably and consistently at a level above that evident in the rest of Britain.⁵

6. Yet, an additional point made by Gould was that, 'almost without exception, the voter was treated as an afterthought by virtually all the other stakeholders', and that 'voters were overlooked as the most important stakeholders to be considered at every stage of the election'.⁶

7. We have concerns in two overlapping areas. Firstly, since the date of these elections has been fixed and well known, the speed at which this legislation is being considered by parliament is regrettable and limits scrutiny of important electoral legislation. This could have been legislated for earlier, thereby permitting more detailed scrutiny. Lack of scrutiny can often cause later difficulties in electoral processes.

8. Secondly, it is not immediately apparent that voters' or civil society views are being given the space and time to be heard by either government or parliament. The Committee's call for written evidence was open for only six days, two of which were at a weekend, and only one oral evidence session has been scheduled with practitioners two days after the Bill was published. This is inadequate for a Bill affecting the possibility of voting for millions of Scots. The Policy Memorandum suggests that stakeholders such as the EMB and Electoral Commission etc have been discussing these proposals with government. This, of course, is appropriate and desirable. However, it is not immediately apparent that broader civil society has been able to contribute, or how voters' interests have fed into them. This is regrettable and risks repeating the issues that Gould highlighted in the run up to 2007.

Postal Voting

9. Given the difficulties that many voters requesting a postal vote close to deadlines could cause, Clark has argued elsewhere for extended postal voting deadlines and

⁴ Venice Commission (2018) *Code of Good Practice in Electoral Matters*, Strasbourg: Council of Europe, p.10. Electoral Commission (2007) *Scottish Elections 2007: The independent Review of the Scottish Parliamentary and Local Government Elections 3 May 2007*, Edinburgh/London: Electoral Commission.

⁵ See: Clark, A. (2015) 'Public Administration and the Integrity of the Electoral Process in British Elections', *Public Administration*, 93, (1), pp86-102; Clark, A. (2017) 'Identifying the Determinants of Electoral Integrity and Administration in Advanced Democracies: The Case of Britain', *European Political Science Review*, 9, (3), pp. 471-492; and James, T. and Clark, A. (2020) 'Delivering Electoral Integrity Under Pressure: Local Government, Electoral Administration and the 2016 EU Referendum in the UK', *Local Government Studies*, early view.

⁶ Electoral Commission (2007) *Scottish Elections 2007: The independent Review of the Scottish Parliamentary and Local Government Elections 3 May 2007*, Edinburgh/London: Electoral Commission

resourcing in the run up to the 2021 Scottish parliament elections.⁷ The Bill proposes a shortening of the postal vote deadline from (as currently envisaged) 20th April to 6th April 2021, a reduction of eleven working days, and two full weeks. There are two sets of issues to be considered here, those which apply to electoral administrators, and those which apply to voters. These considerations appear to be in conflict.

10. From the perspective of electoral administrators, the danger is for them to be swamped with applications close to the deadline, which could make the elections close to undeliverable. Bringing forward the postal voting deadline makes sense from this perspective, as it would provide longer to process applications.

11. From the voters' perspective however, the proposal contained in the Bill is deeply problematic. It is an unfortunate fact that most voters pay little attention to electoral affairs and the minutiae of such deadlines. Often voters only start to pay attention once a campaign is well under way, and there is much greater coverage. Shortening the deadline to one which is effectively only eight working days after the dissolution on 25th March (or recess according to the Bill's proposals), risks many voters missing that deadline and thereby undermining the aims of this Bill in the first place. Voters with reading and other accessibility difficulties could be particularly affected. This would be highly unsatisfactory.

12. We would make three interlinked proposals in this regard. Firstly, in the interests of voters, that postal vote deadlines are extended to the original date of 20th April. Secondly, the main difficulty here is simply that electoral registration and administration is under-resourced. We would propose a significant increase in resourcing to allow additional short-term staffing, training and support to be provided to process the expected influx of postal votes and registration activity that always precedes major electoral events. There is currently plenty of time for this resource to be allocated, recruitment to be undertaken and training organised. Thirdly, a massive and sustained public education campaign needs to be initiated from the turn of the year highlighting the need to request postal votes early, and not wait for the deadline. This should include press, television and social media advertising as well as the current efforts that some local authorities make. The Electoral Commission could lead on this.

13. Issues around deadlines equally applies to proxy votes and the deadlines around those, given that some vulnerable people may seek proxy votes close to the deadline.

14. We note also the proposal for Ministers to be given the power, in the event of postponement, to change the election to all-postal vote. This will need considerable resourcing were it to take place, as recognised in the financial memorandum, but we have no objections in principle to there being an all-postal ballot. All-postal elections were trialled in the UK in some local elections in 2000, 2002 and 2003. In some of those pilots turnout doubled. The largest experiment with all-postal elections was in four English regions for the 2004 European elections. Turnout also doubled in those

⁷ <https://spice-spotlight.scot/2020/06/30/coronavirus-covid-19-what-could-the-impact-be-on-the-ordinary-general-election-to-the-scottish-parliament-scheduled-for-may-2021/> Views expressed are Clark's own.

four areas compared to 1999, the previous elections.⁸ International experience more generally shows that all-postal elections can generate higher turnout.⁹ Comparative experiences of holding elections during the pandemic in Bavaria showed that officials could move from a system of postal voting on demand to an all-postal election at short notice.¹⁰

15. We do however have concerns about there being no parliamentary procedure around this. Consultations with the PO, EMB and Electoral Commission may be appropriate, but risk crowding out other voices and views. Indeed, there seems to be a contradiction in the reasoning in the policy memorandum around this. In paragraph 46, this power is envisaged only being used if there is *at least a six month* postponement to polling day.¹¹ However, in paragraph 21, it is suggested that the need to act quickly requires bypassing parliamentary procedure. If the postponement is more than six months, which would be highly problematic, there is nevertheless time for parliamentary oversight, perhaps through the affirmative procedure.

Extending Polling Day

16. Extending polling hours and provision has been a recurrent means of trying to implement social distancing requirements. Typically, this has taken the form of early voting. Provision of early voting sites was exceptionally popular in the US election as an attempt to enable social distancing. It also delivered a record turnout, under extremely unfavourable conditions. We have therefore argued elsewhere in favour of early voting.¹² The Bill's general aim of extending polling over multiple days is therefore one that we would support in order to achieve social distancing requirements.

17. The Bill proposes that additional polling days take place within 8 days subsequent to polling day, and that these days need not be consecutive. It also proposes that:

Ministers may also specify in the regulations particular days or times when certain descriptions or categories of persons eligible to vote in person may do so. This would, for example, allow provision to be made requiring voters of a particular age, or in a particular area, who do intend to exercise their right vote, to do so only on specified days or at specified times. There are no plans at present for this to take place, but the power provides this flexibility if required.¹³

⁸ James, T.S. (2011) 'Fewer "costs", more votes? U.K. Innovations in Electoral Administration 2000-2007 and their effect on voter turnout', *Election Law Journal*, 10(1), p.37-52.

⁹ James, T.S. (2012) *Elite Statecraft and Election Administration* (Palgrave: Basingstoke).

¹⁰ Wagner, R. (2020) '[Responding to COVID-19 with 100 per cent Postal Voting: Local Elections in Bavaria, Germany](#)' in James, T., Clark A. & Asplund, E. (eds) *Covid and Elections*.

¹¹ Present authors' italics.

¹² Submission to the House of Commons Public Administration & Constitutional Affairs Committee to their current Electoral Commission/COVID-19 in elections inquiry. Also see:

<http://www.electoralmanagement.com/covid-19-and-elections/> and James, T.S. and Alihodzic, S. (2020) 'When is it democratic to postpone an election? Elections during natural disasters, COVID-19 and emergency situations', *Election Law Journal*, 19(3), pp. 344-362; James, T.S. (2020) 'New Development: Running elections during a pandemic', *Public Money and Management*.

¹³ Policy Memorandum, paragraph 32.

18. No real justifications are given for these proposed measures. We would continue to recommend early voting, and for this to be carried out on consecutive days until polling day. This will give certainty to voters and electoral administrators. Alternatively, to avoid increased disruption to Schools being used as polling stations, it might be that polling be extended from Thursday over the weekend, including Friday. Whatever the intention, it should be more explicitly stated and declared early. We would suggest that there are considerable difficulties – ballot security, recruitment etc – of any extensions to polling day being non-consecutive.¹⁴

19. We have reservations about the proposal for different groups of voters to be given specific times and days that they can vote. This has happened in a number of cases internationally where individuals have been COVID-19 positive (e.g. Jamaica; Sri Lanka), although we do not have evidence how they worked in practice.¹⁵ Our reservation is based upon the fact that voters do not pay sufficiently close attention to electoral matters to avoid potential problems which risk de-franchising those who get it wrong, and how presiding officers would deal with this in practice. Stratifying particular groups of voters to certain times and slots would require at minimum a highly targeted, possibly localised or even individualised public information campaign. While the Policy Memorandum suggests there are no plans for this at present, we would suggest that the Committee request further information from the Scottish government on their thinking around this issue and that any such practice be avoided if at all possible.

20. Finally, we would ask the Committee to consider what the balance between increased postal voting and extended voting hours is likely to be. This is not forecast in the policy memorandum, but would seem to be crucial in understanding how the elections are likely to unfold.

Local Lockdowns

21. The need for further local lockdowns could see further disruption to the elections. It is possible to see some areas, in higher tiers, require more stringent COVID-19 mitigation measures while others in lower tiers may not require the same level of mitigations. There is no reason from the point of view of electoral integrity why differential mitigations are necessarily problematic. In either case, electoral administrators would be doing what is necessary in that locality to provide a safe electoral process. The choice for administrators in lower tier localities would be whether or not to conduct the election with a higher level of mitigations to provide additional reassurance.

22. We are concerned about the assertion that a local lockdown could lead to the postponement of the entire election.¹⁶ The reason given, that a national election should occur simultaneously, is not unreasonable, but it is not entirely persuasive. There is precedent for national elections to take place, albeit with one or other locality electing their representative later. In UK general elections, there have been several

¹⁴ See also: Financial Memorandum, paragraph 21.

¹⁵ <https://blogs.lse.ac.uk/covid19/2020/10/23/people-with-covid-19-and-those-self-isolating-must-not-be-denied-the-vote/>

¹⁶ Policy Memorandum, paragraph 48.

instances where a candidate has died during the election.¹⁷ In this case, the general election goes ahead, but with the affected area postponed until 28 days later. A version of this adapted for Scottish parliament circumstances, perhaps by region, would be preferable, with postponement only if multiple regions were affected. Failing this, and given the nature of COVID-19 and lockdowns, there could be an almost endless cycle of calling the election, then postponing because of local lockdowns. This would be most undesirable.

Emergency proxies

23. COVID-19 means that there is a danger that those positive and / or isolating close to deadlines or polling day may be unable to vote. It is vital that people in this situation are not denied the vote. There have been instances where they have been denied the vote because of various local laws (for example: Spain, Taiwan, Singapore). Elsewhere, polling authorities have supported their participation by various means, including: the provision of medically supported polling stations (Israel); drive through polling centres (Czech Republic); special polling hours & places (Jamaica; Sri Lanka); and mobile ballot boxes allowing voting from home (Lithuania). Elsewhere, postal and proxy voting have served as the means by which this problem is addressed.¹⁸

24. Proposals in the Bill for dealing with this revolve around emergency proxy voting. There is merit in adapting a pre-existing procedure, but there are several issues here. Firstly, electoral administrators have already voiced concern pre-pandemic about increased incidence of emergency proxies and the pressures these put on the system.¹⁹ This is only likely to increase those pressures somewhat.

25. Emergency proxy applications can only be accepted until 5pm on polling day. This leaves the potential for someone who is confirmed positive during polling day to potentially be unable to vote if they have had a late test result. This may be a minority of cases, but it would still remove the ability to vote due to no fault of the voter. This is undesirable. Deadlines and law around emergency proxies need considered urgently given that there is little time between the current legislative process and the commencement of the election process.

26. Thirdly, further consideration should urgently be given to alternative means of providing the vote for COVID-19 positive voters.

Further Postponement

27. Postponement of any elections or democratic processes is a serious matter because it denies citizens their right to vote and an opportunity to hold their representatives accountable.²⁰ Practice in other democracies reacting to Coronavirus

¹⁷ For example: http://news.bbc.co.uk/1/hi/uk_politics/election_2010/england/8638371.stm

¹⁸ Asplund, E., Stevense, B., James, T.S., & Clark, A. 'People with COVID-19 and those self-isolating must not be denied the vote', LSE Blog, <https://blogs.lse.ac.uk/covid19/2020/10/23/people-with-covid-19-and-those-self-isolating-must-not-be-denied-the-vote/>.

¹⁹ James, T. S. & Clark, A. (2020) Delivering electoral integrity under pressure: local government, electoral administration, & the 2016 Brexit referendum, *Local Government Studies*, DOI: [10.1080/03003930.2020.1719075](https://doi.org/10.1080/03003930.2020.1719075)

²⁰ James, T.S. and Alihodzic, S. (2020) 'When is it democratic to postpone an election? Elections during natural disasters, COVID-19 and emergency situations', *Election Law Journal*, 19(3), pp. 344-362.

earlier in the pandemic has been to reschedule postponed elections and hold them relatively quickly, our analysis shows.²¹

28. We are concerned about the Bill's proposal to give the Presiding Officer powers to postpone the elections for up to six months, with the possibility of these being used on more than one occasion, or as mentioned above, due to local lockdowns. The Scottish parliament term has already been extended from four to five years in recent years. Any further extension risks democratic accountability to the electorate, which is crucial under current circumstances, and would extend the current parliament to a comparatively long term. Given international experience of holding elections under COVID-19, the presumption should be that the elections will be held as scheduled.

29. At very least, if parliament is sitting or in recess, which under the terms of this Bill it would be, the full parliament should make this decision. We would continue to have reservations about this for the reasons given above, and because there are difficulties about incumbents being seen to extend their terms. Nevertheless, in the event of this happening, we would expect the limit of the elections being held by the absolutely final date of 5th November 2021 to be non-negotiable or postponeable.

Additional Practicalities Not Covered by the Bill

30. There are several additional practicalities that the Bill does not address, and which the Committee might wish to seek some clarity on.

31. A key difficulty could, for example, include problems in recruiting sufficient staff to populate polling stations and counts. These risks will be expanded somewhat if polling is extended over several days. Our research into poll workers in the 2016 Scottish parliament elections has shown that: the average age of polling station workers in the four councils studied was 54.8, with around 39% over 60, and the oldest being 84. Thirty four percent were retired and 60.6% of polling station workers in 2016 were women, lending a gendered aspect to the problem.²²

32. Numerous elections conducted under the pandemic have had difficulties with poll workers not turning up on election day, combined with pre-existing problems of recruitment. We suggest that such difficulties point to a need to over-recruit for the available positions. Our research has suggested that some potential poll workers volunteer to work at elections because of social and civic duty motivations.²³ Electoral services teams likely to face pressure on poll worker recruitment because of the pandemic may therefore want to consider messages emphasising such themes in their recruitment activities for the 2021 elections (and beyond).

33. Research into poll worker motivations has also indicated that many are encouraged to do so by the chance to earn some extra money.²⁴ We have argued

²¹ James, T.S. & Asplund, E. (2020) 'What happens after elections are postponed? Responses to postponing elections during COVID-19 vary by regime type', International IDEA, <https://www.idea.int/news-media/news/what-happens-after-elections-are-postponed-responses-postponing-elections-during>

²² <https://spice-spotlight.scot/2020/06/30/coronavirus-covid-19-what-could-the-impact-be-on-the-ordinary-general-election-to-the-scottish-parliament-scheduled-for-may-2021/>

²³ Clark, A. and James, T.S. (2020) 'Electoral Administration and the Problem of Poll Worker Recruitment: Who Volunteers, and Why?', Working Paper.

²⁴ Clark A, James TS. [Poll Workers](#). In: Norris, P; Nai, A, ed. *Election Watchdogs: Transparency, Accountability and Integrity*. New York, NY, USA: Oxford University Press, 2017, pp.144-166.

elsewhere that it may be necessary for local authorities to increase the amount paid to poll workers to ensure sufficient recruitment and reward for working under difficult pandemic circumstances with higher risk.²⁵ Some evidence is beginning to emerge that paying more was a strategy some local governments used to recruit sufficient poll workers in the 2020 US elections. Investment in advertising campaigns to recruit younger poll workers is also advised.

34. Potentially many polling stations based in schools, churches and community centres may not be able to be used because of the dangers of COVID-19's spread. At minimum, they will have to be well-ventilated, but additional work will be needed on layout of polling stations, much of which will require additional space. This will include, where possible: one-way systems to access and exit polling stations, which are also accessible for those with mobility problems, and additional and clearer signage. These difficulties will be multiplied if polling is to continue over several, non-consecutive days.

35. Additional issues that administrators will have to contend with, and not included in the Bill, include:

- the need for extra staff to regularly sanitise polling stations and ballot boxes,
- provision of sufficient PPE for administrators, polling and count staff,
- the provision of sufficient hand sanitiser and cleaning material in polling stations,
- single-use pencils, or communicating the ability for voters to use their own pens/pencils,
- questions over mask compulsion, and powers of presiding officers to enforce this,
- social distancing in polling stations leading to queues,
- changes to nomination procedures.

36. Led by the EMB, Scottish councils in the council by-elections they have been running, for example, have requested that voters wear masks, created pathways for voters through polling stations, and implemented social distancing. They have also developed commendably accessible infographics highlighting changes to polling places, as have the Electoral Commission.²⁶

37. A key risk factor is the potential for key administrators to become COVID-19 positive during the electoral process. Returning officers, their deputies and other senior electoral administrators have a central role in delivering the election. Contagion to election teams and senior administrators during the electoral process, and particularly close to polling day, could present considerable difficulties, and, conceivably in the worst-case scenario, local postponement of elections being administered by that local authority. Councils therefore need contingency plans for such a scenario, which can be implemented quickly to ensure minimum disruption.

²⁵ Birch S, Buriil F, Cheeseman N, Clark A, Darnolf S, Dodsworth S, Garber L, Gutierrez-Romero R, Hollstein T, James TS, Mohan V, Sawyer K. [How to Hold Elections Safely and Democratically During the COVID-19 Pandemic](#). London: British Academy, 2020. Shape the Future.

²⁶ For example: <https://twitter.com/PerthandKinross/status/1326096006832906247>

38. The process of counting will also take longer because of the need to social distance and sanitise surfaces. Results will be unlikely to be delivered overnight, as they are under normal circumstances, and may take some time to become known in some cases. There will be nothing improper about this. Instead it will allow electoral administrators to provide accurate results in safe circumstances.

Resourcing & Financial Memorandum

39. These will be significant challenges for already pressed local authorities. They will need additional resourcing to ensure that they can be delivered. Our research has shown a considerable increase in the levels of investment needed to ensure safety when conducting elections under COVID-19 circumstances. For example, the provision of PPE in South Korea was estimated to add \$16 million to the cost of running their election in March, whereas hand sanitiser and other health measures added \$32-37 million to Sri Lankan elections.²⁷

40. Local government budgets have suffered considerably under COVID-19, limited additional government support for mitigation measures and an ongoing financial squeeze. Election funding has already been squeezed, with it being unappreciated just how small and under-resourced electoral services teams are.²⁸ Some electoral services officers have been redeployed because of COVID-19, hindering efforts to prepare their core functions. This squeeze on resources was already seen to be having a negative effect on electoral services even prior to COVID-19.²⁹

41. The Financial Memorandum notes that while some issues around physical distancing in polling stations etc are not covered in the Bill, there are however implications flowing from the Bill for some of these issues.³⁰ It is regrettable therefore that in two areas, no cost estimates are included either on physical distancing in polling stations and associated costs, and also in relation to costs for voting over multiple days.³¹ These should be estimated, and we suggest that the Committee ask for further evidence from the Scottish government in this regard.

42. This is not the time to be parsimonious with election funding. The Scottish government should immediately make sufficient funds available for the necessary COVID-19 mitigations and the safe conduct of the elections. It should also make public post-election not only the costs of running the elections, but the additional COVID-19 mitigations necessary.

²⁷ Asplund, E. James, T. and Clark A. (2020) 'Electoral officials need more money to run elections during Covid-19' Democratic Audit, July 2020, <https://www.democraticaudit.com/2020/07/14/electoral-officials-need-more-money-to-run-elections-during-covid-19/>.

²⁸ Clark A. [The Cost of Democracy: The Determinants of Spending on the Public Administration of Elections](#). *International Political Science Review* 2019, **40**(3), 354-369.

²⁹ Clark, A. (2017) 'Identifying the Determinants of Electoral Integrity and Administration in Advanced Democracies: The Case of Britain', *European Political Science Review*, 9, (3), pp471-492, also see: James, T.S. and Jervier, T., 2017. The cost of elections: the effects of public sector austerity on electoral integrity and voter engagement. *Public Money & Management*, 37(7), pp.461-468.

³⁰ Financial Memorandum, Paragraph 8.

³¹ Financial memorandum, paragraphs 20 & 21.

Conclusion

43. Overall we recommend that:

- There be a rethinking of proposals around postal voting deadlines. The deadline for applying for postal votes should be no earlier than it usually is for electoral events in Scotland.
- Parliamentary procedure be applied to any proposal for all-postal elections to be organised in the event of postponement
- There be a rethinking of some of the proposals around extending polling day, particularly regarding non-consecutive days, early voting and for certain groups to vote separately
- Clarity be sought on the balance being proposed between increased postal voting, and extended polling days
- Potential issues around emergency proxies as a method of dealing with COVID-19 voters are examined
- There be a presumption that the election will be held as scheduled, and with any proposal for postponement the responsibility of the whole parliament and not extendable beyond Nov. 2021
- Additional issues, not legislated for by the Bill but which are clearly related to its provisions, are considered
- Further information is sought about resourcing necessary mitigations and that sufficient resources are made available by Scottish government for the necessary COVID-19 mitigations, so that the elections can be held as scheduled.

44. We are grateful for Committee taking the time to consider this in-depth paper and hope that it finds this evidence helpful in its deliberations and scrutiny over this vital Bill. We would welcome the opportunity to discuss any of these aspects further should the Committee feel it appropriate to do so.

**DR. ALISTAIR CLARK
READER IN POLITICS,
NEWCASTLE UNIVERSITY**

**PROFESSOR TOBY S. JAMES
PROFESSOR OF POLITICS AND PUBLIC POLICY
UNIVERSITY OF EAST ANGLIA**

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