

Independent Review of Electronic  
Balloting for Industrial Action:  
Knight Review - Call for Evidence

Thompsons Solicitors' response

July 2017

Thompsons is the largest and most experienced personal injury, employment and trade union law firm in the UK. We are specialists in industrial action work, on which we advise most of the major trade unions in the UK through our specialist Trade Union Law Group. We have represented trade unions in most of the leading decisions relating to industrial action.

## Foreword

Thompsons welcomes this opportunity to contribute to this Review. We share the widely held view that e-voting in some form is a desirable goal for a modern democracy and one which is to be achieved in the short-term.

We do though want to make four overarching observations at this very early stage in this response as we believe that they are relevant to the Review's whole approach:

Firstly, although the Review is conducted within the context of balloting for industrial action, these are not industrial relations issues per se. They are issues of participatory democracy and the focus of the review should be on that set out in section of 4(1) of the Trade Union Act 2016: '...the delivery of secure methods of electronic balloting for the purpose of ballots held under section 226 of the 1992 Act (requirement of ballot before action by trade union)'.

Secondly, security of electronic balloting in industrial action ballots needs to be assessed in its wider context. For example, nobody would question that the necessary security is available for the purpose of electronic banking and transmission and storage of health data. Electronic means of transacting should increasingly be recognised as the 'norm', expected as a matter of course by those taking part. As the Speaker's Digital Democracy report noted,<sup>1</sup>

"Many of the people we spoke to did not understand why they could not vote online, particularly young people. People are used to doing their banking and other day-to-day activities online and many feel that they should also be able to vote in this way."

So far as balloting specifically is concerned, amongst private sector and voluntary organisations, the only ballots which currently cannot be conducted electronically are trade union ballots under the 1992 Act<sup>2</sup>.

Thirdly, we consider that it is important to remember that what is under consideration is a system of voting which complements an existing system. Despite its imperfections that system has for many years has been considered by many governments to be satisfactory in respect of the terms of reference matters of:

- The risks of interception, impersonation, fraud or misleading or irregular practices;
- The risk of intimidation of union members and protection of anonymity of ballot responses;
- The aims of the Trade Union Act 2016 to ensure strikes and related disruption to the public only happen as a result of a clear, positive decision by those entitled to vote.

In light of this, our view is that it would be inappropriate to have excessively high expectations of an acceptable e-voting system. We believe that the appropriate acceptable expectation is that it should be no less efficacious, or secure, than the existing requirements. Any improvement on them is merely a bonus<sup>3</sup>.

<sup>1</sup> Open Up! Report of the Speaker's Commission on Digital Democracy, 26 January 2015, page 59 which also supported the introduction of e-voting in elections by 2020 (page 61)

<sup>2</sup> Trade Unions and E-Voting, is it possible? <https://www.electoralreform.co.uk/trade-unions-and-e-voting-is-it-possible>

<sup>3</sup> Such as Cast-as-Intended verifiability, Recorded-as-Cast verifiability, certain cryptographic techniques, multiple voting, vote integrity based on digital signatures, or multiple-channel communication – internet, SMS, etc.

Fourthly, most of the research and evaluation literature which deal with e-voting processes and systems which are referred to within the Call for Evidence relate not to workplace ballots, but to national political elections. Both share common aims like the need for secrecy, but they are not the same. The levels of acceptable risk do, and should, vary as between them. The typical scale of those votes is also very different. Thompsons urges Sir Ken Knight to keep this fact in the forefront of his mind when considering the evidence which is tendered.

We also question the scope of the review. It is said that the terms of reference include 'The aims of the Trade Union Act 2016 to ensure strikes and related disruption to the public only happen as a result of a clear, positive decision by those entitled to vote.' Care must be taken to ensure that the scope of the Review is confined to '...the delivery of secure methods of electronic balloting for the purpose of ballots held under section 226 of the 1992 Act...', as provided for in section 4(1) of the Trade Union Act 2016, and that restricting further the right to take industrial action does not become an influential factor. That is not permitted by the Act.

Paragraph 12 of the Call for Evidence Document recognises that electronic systems can relate to systems provided at a polling or voting station which are not necessarily remotely accessed but which allow a digital rather than a paper-based system to cast a vote. The Call for Evidence then limits consideration to '...an approach that uses technology to allow someone to cast a vote remotely (i.e. somewhere separate from where any other votes are being cast or counted) and potentially, on a range of systems, which allow for transmission of that information'. We consider that it would be entirely inappropriate to rule out of consideration for the purpose of the Call for Evidence electronic means of voting in the workplace—whether by means of a voter or polling station or by use of the employer's own system. Our understanding is that electronic means of transmission of voter information and voting using the employer's system is not ruled out of consideration in the Call for Evidence. However, we note that no specific questions are asked about the separate issues which will be raised concerning use of an employer's own system for transmission of voting information and voting. The most important of these will be ensuring that employers are not permitted to frustrate the ballot process by lack of access to their systems (including inadvertently), or by abusing their administrator status to compromise the integrity or secrecy of the ballot, e.g. by the use of key-logging spyware.

We now expand on these observations.

# One: Participatory Democracy

In paragraph 15 the Call for Evidence notes,

“The standards required by the legislation in relation to industrial ballots are, understandably high standards. Industrial action can have significant impact not just on businesses and those directly employed by the effected business. Industrial action can have profound effects on the wider economy, on individuals, families and other businesses who have no direct interest in the industrial dispute under consideration.”

It is certainly true that industrial action can have a significant impact; the recent Southern Trains dispute is such an example. When one looks around society for examples of votes which can have “profound effects on the wider economy, on individuals, families and other businesses who have no direct interest in the [issue] under consideration” numerous examples can be found. Examples of these are:

- Shareholders in large companies voting on a company’s policy on corporate responsibility, investments or environmental policies<sup>4</sup>;
- Directors voting behind closed doors to set and follow such policies;
- The selection of a political party’s candidate for election who, if successful, then uses their office to implement their views; and
- Referendums such as that recently conducted in relation to Scottish Independence in which only Scots had a vote despite the outcome having significant effects on the whole UK.

To illustrate this point we refer specifically to section 360A of the Companies Act 2006 which enables e-voting by shareholders and imposes far fewer restrictions on them than the 2004 Act does on trade unions (emphasis added):

## **‘360A Electronic meetings and voting**

- (1) Nothing in this Part is to be taken to preclude the holding and conducting of a meeting in such a way that persons who are not present together at the same place may by electronic means attend and speak and vote at it.
- (2) In the case of a traded company the use of electronic means for the purpose of enabling members to participate in a general meeting may be made subject only to such requirements and restrictions as are—
- (a) necessary to ensure the identification of those taking part and the security of the electronic communication, and
- (b) proportionate to the achievement of those objectives.’

Noteworthy too is the fact that all the major political parties in the UK have sufficient confidence in e-ballots to conduct their internal elections using them:

- Zac Goldsmith was elected as the Conservative Party’s candidate for London Mayor in 2016 in an online ballot. He beat his rivals winning 70% of the 9,227 votes cast. Votes were cast ‘predominantly online’ with voters also able to take part via post.
- Labour’s leader, Jeremy Corbyn, was elected in the largest online voting election in UK history with 343,995 (81%) party members voting online.
- In London, the Liberal Democrat candidate Caroline Pidgeon, and the Green Party’s candidate Sian Berry were both elected in online ballots.
- In 2014, the Scottish National Party also adopted online voting to elect their new Deputy Leader, Stewart Hosie.<sup>5</sup>

<sup>4</sup>By way of example of this type of scenario, in the US in February 2017 there was a Sanderson Farms Inc shareholder proposal requesting the third-largest U.S. poultry producer phase out the use of medically important antibiotics for growth promotion and disease prevention. It is the only large U.S. chicken producer that has not made a commitment to limit its use of those drugs, as public health experts raise the alarm about the link between farm use of antibiotics and the rise of human infections from drug-resistant bacteria called superbugs. (Source: Reuters <http://tinyurl.com/je4u525>). Although this is an American example it could just have easily arisen in the UK and is illustrative of the point.

<sup>5</sup> All details from <http://tinyurl.com/gto76r2>

It would be odd to suggest that a ballot of a handful of staff should be subject to more rigorous requirements than choosing a potential new Prime Minister, or an independence referendum. The highly political nature of the debate which led to this Review means that such an error would be easy to make if not specifically guarded against.

We therefore urge the Review to be cognizant of the balloting and voting procedures elsewhere in society, and to make its recommendations as part of that wider understanding.

## Two: Existing Systems

We will consider the existing industrial action balloting systems in our response to Question 1. We do though think it is instructive to spend a moment considering the systems which are currently considered to be acceptable in other contexts.

For local and general elections, as well as referendums, the following basic structure applies:

1. A letter is sent to a postal address with details of how to be enrolled onto the electoral roll;
2. Whoever opens that letter is able to use that information to register for the electoral roll either via the internet or by post. No checks are made as to their identity, or the veracity of the information which is provided;
3. Ahead of an election polling cards are sent to the same address. The addressees are those identified (without verification) in the earlier steps;
4. Between receipt of those cards, and voting, and any amount of intimidation and persuasion may occur without being known to the necessary authorities;
5. A postal ballot can be cast, again without verification of identity. Alternatively a vote may be cast in person. No verification of the voter's identity is made, and undue influence can be applied upon them up to the point they enter the polling station.

This system is considered to be adequate for important decisions such as a choice of government, and whether to remain in the EU. Industrial action ballots have far less impact than those and it would be wrong to hold them to any higher standard.

This is highly relevant to the statutory question<sup>6</sup> of whether 'the required standard' is met by e-balloting, especially the third element of seeking to ensure that "the risk of any unfairness or malpractice is minimised." We consider that this is the minimum acceptable standard when assessing unfairness or malpractice.

<sup>6</sup> Section 54 Employment Relations Act 2004

## Three: Existing Research

Thompsons is unaware of any research that is specifically geared towards trade union industrial action ballots. There is however a paper by the Electoral Reform Society, which frequently acts as independent scrutineer in industrial action ballots and is to be regarded as an expert in the field (noted at footnote 15 of the consultation document) that does address this issue specifically. In particular it concludes that ‘There are risks associated with electronic voting but these are essentially similar to the risks associated with any secure electronic process. Many of the risks are also of the same nature as the risks already related postal voting that is allowable under the 1992 Act, e.g. coercion and secrecy’<sup>7</sup>.

Some research is given prominence within the Call for Evidence even though its focus is quite different to the issue in hand. For instance the Speaker’s Commission’s report ‘Open Up!’ from January 2015 looks specifically at local and national elections. The Estonian elections are also of that type.

A notable omission is the 102 page report by WebRoots Democracy from January 2016 ‘Secure Voting’ about e-voting which contains many examples of e-voting systems at home and abroad.<sup>8</sup>

We also note that some of the material which is referred to is, in terms of IT development, rather elderly. For instance, we note the prominence given in paragraph 29 to a quote by The Open Rights Group about voting being a ‘uniquely difficult question for computer science’. Although this is taken from the Speaker’s Commission’s January 2016 report that quote was actually taken from a January 2007 briefing paper<sup>9</sup> and so is 10 years old. No decade-old statement would normally be applied to a current assessment of IT capability and this demonstrates the care that is necessary to assess the sources’ sources.

Finally, it is important to actually be clear as to what is being assessed in these reports. For example in paragraph 14 of the consultation document there is reference to the Estonian system, and the fact that it “...has an advanced system for verifying citizens’ identity online, but there have been concerns about the security of its system.” If one looks at that criticism<sup>10</sup> then one sees that it relates to “serious architectural limitations and procedural gaps that potentially jeopardize the integrity of elections” when viewed against a background of whether “...a state-level attacker, sophisticated criminal, or dishonest insider could defeat both the technological and procedural controls in order to manipulate election outcomes.” The report concludes “Given the current geopolitical situation, we cannot discount state-level attacks targeting the system in future elections.”

Thompsons does not have the technical knowledge to assess the veracity of this conclusion, and nor do we try to. We do however feel able to say with some confidence that is quite unlikely that a state-level attacker will be interested in most industrial action ballots. As for more prosaic intrusions the Electoral Reform Society notes<sup>11</sup>

“To our knowledge and from our experience of over 20 years of conducting ballots under the 1992 Act, the only occasions where delivery of postal material has been blocked by an organisation is on a handful of occasions where significant numbers of ballot envelopes were being delivered to the organisation. We are not aware of a situation where an organisation has deliberately blocked the receipt of text messages or e-mails in relation to other ballots ERS had administered.”

Whilst it is important to consider the limitations of existing e-voting technology, it remains necessary to do so with a sense of perspective.

<sup>7</sup> See note 2

<sup>8</sup> <https://webrootsdemocracy.org/secure-voting/>

<sup>9</sup> Electronic Voting - A challenge to democracy? (January 2007) [www.tinyurl.com/gnsfckt](http://www.tinyurl.com/gnsfckt). The reference for it given in the Speaker’s Commission report is wrong.

<sup>10</sup> Security Analysis of the Estonian Internet Voting System, <https://estoniaevoting.org/>

<sup>11</sup> See note 2.

## Answers to questions

### **Q1 What are the strengths and weaknesses of the current postal system for achieving the required standards?**

We consider that this is a useful question and welcome its inclusion.

The 'required standards' are those contained in s.54(10) Employment Relations Act 2004, and are that

- (a) those entitled to vote have an opportunity to do so;
- (b) votes cast are secret;
- (c) the risk of any unfairness or malpractice is minimised.

Thompsons has no direct involvement of the administration of these systems and so we will limit this response to a few specific matters.

The efficacy of a postal ballot system for providing an opportunity to vote, like that of an electronic system; relies on the accuracy of information which it is based upon. If the names and addresses of the voters is inaccurate then the system is flawed ab initio – but not irredeemably so. This is true whether it the postal or email address which is out of date. In an age of on-line shopping, banking and travel people are used to updating their contact information on-line. We believe that this is likely to improve the likelihood that those entitled to vote do have an opportunity to do so.

In relation to the risk of unfairness or malpractice, there is nothing inherent in the current postal arrangements which ensures that 'the casting of the vote should be done free from interference from, or constraint by, the union or any of its members or employees'. This is the sister statutory formulation<sup>12</sup> and its focus on interference by only a trade union shows its Thatcherite roots. Industrial action ballots do not exist in a vacuum and employers will frequently run counter-campaigns to try and persuade their employees to vote against industrial action, or to not vote at all.

As the Supreme Court noted "Employees as a class are in a more vulnerable position than employers. Protection of employees' rights has been the theme of legislation in this field for many years."<sup>13</sup> Ultimately an employer chooses who to hire, fire, promote and bestow career opportunity upon and therefore holds the balance of power. The current system doesn't even recognise this, let alone deliberately address it. This becomes of real practical importance where ballot papers are sent to the employee's workplace (as opposed to home) address, or where the ballot relies upon use of the employer's IT systems.

The key concerns relating to unfairness or malpractice are of voter intimidation and voter fraud. Both are possible under the current postal system. However it is notable that there is no evidence of either being shown to be an actual problem in industrial action ballots. No evidence of it was produced to Parliament during the passage of the Trade Union Act 2016 and none is cited in this consultation. When the government commissioned the 2014 Carr Review to 'assess the effectiveness of the existing legal framework to prevent inappropriate or intimidatory actions in trade disputes' no evidence of balloting irregularity was identified. This is significant, and crucial to the assessment of the required standards and the risk of any unfairness or malpractice.

It is very important not to overstate the voter intimidation and voter fraud issues. Even in votes which are monitored these are insignificant issues by volume. For example in the EU Referendum, which inflamed many people's passions and which led to the biggest peacetime political decision in decades, the Electoral Commission reports that<sup>14</sup>

<sup>12</sup> S.230(1)(a) Trade Union and Labour Relations (Consolidation) Act 1992

<sup>13</sup> GJSDA Cyf v Barratt [2010] IRLR 1073 SC at paragraph 35

<sup>14</sup> Report on the 23 June 2016 referendum on the UK's membership of the European Union, The Electoral Commission Report <http://tinyurl.com/gwpppb9>

“Between 1 January and 31 July 2016, a total of 40 cases of alleged electoral fraud relating to the EU referendum were recorded as having been reported to the police across the UK. ... The more than three quarters of cases reported (a total of 33, representing 82.5% of the total reported) related to voting offences. Of these, 19 related to allegations of personation at a polling station. Following police inquiries, five of these cases have been resolved as no further action required, one resulted in a caution being accepted, and the remaining 13 are still under investigation.”

40 cases out of a total of 33,577,342 votes cast gives some perspective on this, as does the fact that nowhere in the Report is voter intimidation even mentioned. Similarly, in its 2014 report specifically on electoral fraud<sup>15</sup> the Electoral Commission concluded,

“6.5 Another concern raised during our review was that voters in some areas were subject to intimidation, harassment, or undue influence around polling stations. Again, ... we did not receive evidence to suggest that such behaviour was widespread, ...”

**Q2 Please give examples of situations where you are aware e-balloting is currently applied. What type of technology is deployed e.g. Internet based, telephone-based? What has been the impact and how has it been evaluated?**

We refer to our earlier answer and to the detailed example contained in the ERS article *Trade Unions and E-Voting, is it possible?*<sup>16</sup> As well as the numerous examples provided in the 102 page report by WebRoots Democracy from January 2016 ‘Secure Voting’<sup>17</sup> and on the websites of providers of e-balloting services such as Smartmatic which gives many examples of e-balloting internationally as well as details of their new TIVI on-line voting system which they say “ensures that voter privacy is maintained, electoral fraud and manipulation are eliminated, voter coercion is reduced and the overall integrity of the electoral process is improved.”<sup>18</sup> TIVI, like most e-balloting systems, can be done via a PC, smartphone or tablet device.

An explanation of the type of technology is outside Thompsons’ field of expertise.

**Q3 How much do you believe the use of e-balloting for industrial action would increase turnout, if it were available? What other access benefits might it bring?**

We do consider that it would increase turn-out, especially amongst younger workers. As the Speaker’s Commission report noted in relation to general elections

“Many of the people we spoke to did not understand why they could not vote online, particularly young people. People are used to doing their banking and other day-to-day activities online and many feel that they should also be able to vote in this way.”<sup>19</sup>

A YouGov poll for the TUC found that more than half (53%) of the 1,711 respondents said voting for strike action electronically through a secure, dedicated website is appropriate, with only one in five (20%) saying it is inappropriate for unions to be able to do this.<sup>20</sup>

<sup>15</sup> Electoral fraud in the UK Final report and recommendations, Electoral Commission, January 2014

<sup>16</sup> <https://www.electoralreform.co.uk/trade-unions-and-e-voting-is-it-possible>

<sup>17</sup> <https://webrootsdemocracy.org/secure-voting/>

<sup>18</sup> <http://www.smartmatic.com/voting/online-voting-tivi/>

<sup>19</sup> Page 59

<sup>20</sup> December 2015. <https://www.tuc.org.uk/union-issues/trade-union-bill/majority-british-people-say-electronic-balloting-vote-strikes>



If it can be done from your smartphone or tablet then it requires a minimum of effort at a time which suits you. It seems barely credible that turnout would not increase, although we cannot guess at how much.

Other access benefits might include benefits for the disabled for whom the use of technology allows them to participate in a way they might not have done before. For example written material needs to be read to the blind and thus impairs the secrecy of the ballot. Technology allows the possibility that adaptive technology already in use will, for the first time, allow for a genuinely secret vote by those groups. Allowing e-balloting would be consistent with the spirit of the public sector equality duty.

Throughout the passage of what was then the Trade Union Bill, the government claimed that one of its purposes was to increase engagement between trade unions and their members. As Electoral Reform Services also observe<sup>21</sup>, particularly in relation to online voting, voters can be presented with a 'more engaging voting experience', increasing the likelihood that voters will participate in a ballot from an informed position.

**Q4 Which forms of e-balloting system (e.g. telephone / internet) would help ensure access? What evaluations have taken place on the robustness and resilience of different systems to ensure access in a voting context?**

As we explained in our foreword, we are concerned to ensure that methods of electronic voting in the workplace – whether at a polling or voting station, or using the employer's system – are given due consideration in the Call for Evidence and the Review.

So far as use of the employer's own system, is concerned, consideration should be given to ensuring that employers are not permitted to frustrate or compromise the conduct of the ballot even inadvertently, for example through the operation of its firewall and other security procedures.

We are also concerned to ensure that all potential methods of electronic voting are considered. We understand the principal means to be by email, by accessing a website or by text message. However, we do not rule out the possibility of other means being available, and these should be considered.

Beyond this broad statement, this is outside Thompsons' field of expertise and we cannot comment.

**Q5 In what circumstances might e-balloting be more or less secret when compared to postal voting?**

We do not consider that e-balloting is likely to prove less secret than postal voting, a position with which ERS appears to agree. This is all that is required to meet the 'required standard'. We note ERS' observation that '...Many of the risks [of e-balloting] are also of the same nature as the risks related to postal voting that is allowable under the 1992 Act, e.g. coercion and secrecy'<sup>22</sup>.

<sup>21</sup> See note 2

<sup>22</sup> See note 2.

**Q6 What mitigations can be employed to ensure that under e-balloting, hacking of the system, even if successful, would not allow the identity of a vote to be revealed? Have such mitigations been evaluated?**

This is outside Thompsons' field of expertise and we cannot comment.

We would however anticipate that this voter information is probably already held by scrutineers in an electronic format such as in databases or spreadsheets. We therefore recommend that Sir Ken Knight make enquiries of the current independent scrutineers to ascertain the extent to which this information is already held by them in an electronic format and the extent to which it is already safe from hacking. Asking about this, and the number of known hacking events, would thereby provide a yardstick against which to measure the remoteness of such a theoretical threat under e-balloting. We would expect the threat to be purely theoretical for all practical purposes. This inference is supported by the following assessment by Professor Robert Krimmer MBA, PhD Professor of e-Governance at Tallinn University of Technology, Estonia,<sup>23</sup>

**“Securing voter records and personal details**

As most online voting systems do not solely rely on organisational measures to protect secrecy of the vote, such a scenario where they record how someone has voted and leaking their identity is very unlikely. However it cannot be said that it is impossible only that it is very unlikely and very hard to do.”

**Q7 Would e-balloting increase the scope for intimidation and undue influence (being forced to vote, and being forced to show which way someone had voted, and being forced to vote in a certain way)?**

We refer to our earlier observations about the extent to which this is a problem which is more illusory than real.

We do not believe that e-balloting increases the scope for intimidation and undue influence. The publications which we have referred to dealing with real-world systems address these issues and we refer to them. However, as an example we reproduce the following example of a capacity which is available only in e-balloting,

**“Multiple voting**

If the coercer supervises the voting process then they can be sure that the voter followed their instructions. However multiple voting capability provides a facility to allow a voter to cast another vote later that will be counted, rather than the vote cast earlier in the presence of the coercer. In this way the use of multiple voting prevents a coercer or vote buyer knowing that the supervised vote is actually the counted vote. The introduction of online voting has allowed the implementation of this practice, so coerced voters can cheat the coercer without detection. Scytl Online Voting systems support this mechanism when allowed by legislation.”<sup>24</sup>

**Q8 How do you believe technology has evolved or will evolve to address the risks set out above?**

This is outside Thompsons' field of expertise and we cannot comment beyond what we have said already.

<sup>23</sup> Secure Voting, WebRoots Democracy 2015, page 55 (<https://webrootsdemocracy.org/secure-voting/>)

<sup>24</sup> Secure Voting, WebRoots Democracy 2015, page 61 (<https://webrootsdemocracy.org/secure-voting/>)

**Q9 How will e-balloting change the scope for industrial action and how does that affect the public interest?**

We do not understand this question. However, we understand that it is the government's assessment that enhanced participation in ballots is in the public interest. In its last manifesto, the Conservative Party pledged that a Conservative government would introduce strike turnout thresholds for all ballots on the basis that:

"...strikes should only ever be the result of a clear, positive decision based on a ballot in which at least half the workforce has voted. This turnout threshold will be an important and fair step to rebalance the interests of employers, employees, the public and the rights of trade unions."<sup>25</sup>

We therefore see any measure which facilitates participation as entirely consistent with that position. We also refer back to our comments about the parameters of the Review being confined to those set out in Section 4 (1) of the Trade Union Act.

**Q10 Are there other risks or challenges associated with e-balloting, not identified above? How might they be mitigated?**

This is outside Thompsons' field of expertise and we cannot comment.

**Q11 How might other non-technological processes need to change, such as the role of the scrutineer, if e-balloting were made available for industrial ballots?**

This is outside Thompsons' field of expertise and we cannot comment.

**Q12 What costs are associated with the technological options around e-balloting and also non-technological mitigations?**

This is outside Thompsons' field of expertise and we cannot comment.

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<sup>25</sup> Conservative Party Manifesto, 2015