



Persatuan Bertindak Pilihan Raya Bebas dan Saksama (“Tindak”)

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# EC Must Facilitate Ease of Voting — Not the Opposite

24.11.2025

Persatuan Bertindak Pilihan Raya Bebas dan Saksama (“Tindak”) expresses deep concern over the Election Commission’s (EC) continued failure to improve the allocation of polling centres in the Luyang state constituency (Kota Kinabalu). The latest Government Gazette: Notice of Contested Election – Legislative Assembly for the State of Sabah, published on 21 November 2025, confirms that no meaningful corrections have been made. This represents a clear missed opportunity by the EC to ensure smooth and convenient voter movement in a long-established urban constituency.

Under Malaysia’s electoral system, every constituency is divided into polling districts, each of which is assigned to one or more polling centres such as schools, halls, or temporary facilities. Section 7 of the Elections Act 1958 outlines the formation of polling districts and their association with polling centres. A polling district determines where a voter casts their ballot. However, Section 7 remains silent on the requirement that polling centres must be geographically located within their respective polling districts.

As a result, a polling district can be assigned a polling centre situated outside its boundaries, and multiple polling districts may share a single polling centre. Tindak highlighted these problems (via Tindak Malaysia banner) to the EC as early as 2019, shortly after Sabah’s redelineation was passed in Parliament. Our analysis at the time showed significant criss-crossing of voter movement caused by the EC’s flawed allocation of polling centres in DUN Luyang. Refer to the map below:

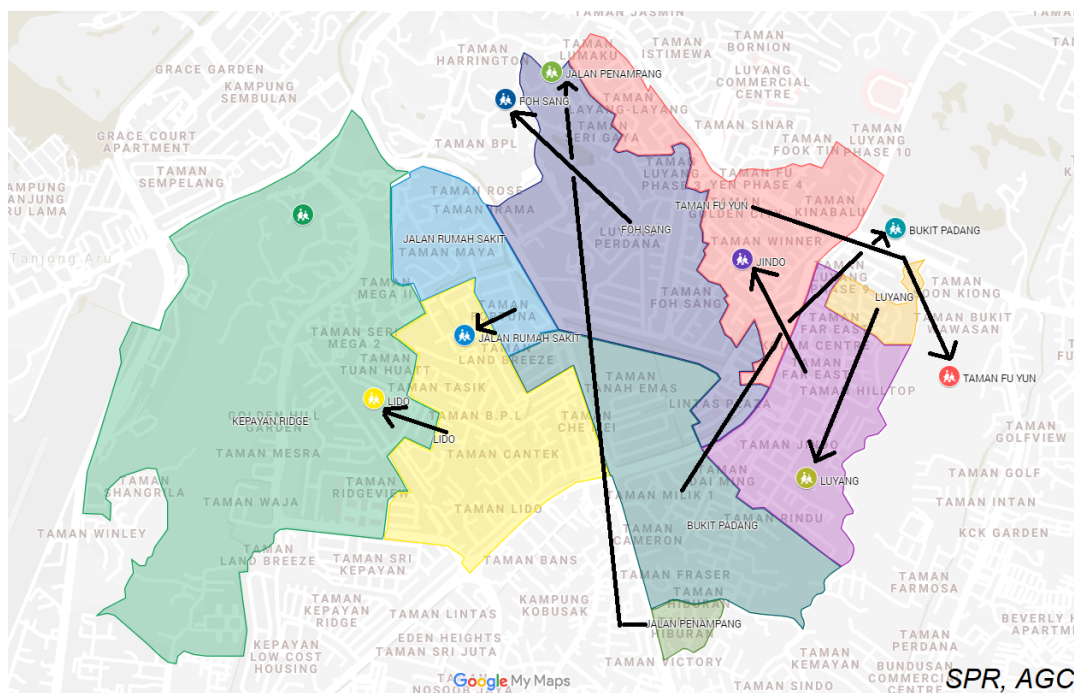


Figure 1: 2019 allocation of polling centres (school sign) to polling districts (coloured polygons) of DUN Luyang. Black Arrows shows how the voters should get to the polling centres. This map was submitted to EC in 2019

Only one polling district—Kepayan Ridge—had an appropriately placed polling centre (Sekolah Menengah Maktab Sabah). In several other districts, voters were expected to travel outside their DUN, and even outside the Kota Kinabalu parliamentary constituency, to cast their votes. This is inconsistent with the Thirteenth Schedule, Section 2(b) of the Federal Constitution, which requires constituencies to be drawn with consideration for voter registration and polling machines.

In 2019, Tindak submitted a detailed proposal to streamline polling-centre allocation in Luyang, aiming to reduce unnecessary cross-district travel and ensure all voters could vote within their own DUN boundaries. We had hoped meaningful improvements would be implemented for the 2020 Sabah State Election and subsequent polls. Unfortunately, our review found that only minimal changes were made in 2022, and these failed to address the core issue of voter accessibility.

In October 2025, we again reminded the EC of the unresolved issues in Luyang and were informed that our suggestions were forwarded to the Sabah EC office. The table in our report shows how, from 2019 to 2025, problematic polling-centre allocations remained largely unchanged.

Polling District (DM)	Polling Centre	2019	2020	2022	2025	Notes
Jalan Rumah Sakit	Tadika Peak Nam Toong	Yes	Yes	Yes	Yes	Polling Centre in DM Lido
Luyang	Sekolah Kebangsaan (Cina) Anglo Chinese	Yes	Yes	Yes	Yes	Polling Centre in DM Jindo

Foh Sang	Institut Pendidikan Guru, Kampus Gaya	Yes	Yes	Yes	Yes	Polling Centre in DM Jalan Kebajikan (DUN Api-Api)
Foh Sang	Dewan Serbaguna Wisma Pertanian	N/A	N/A	Yes (Introduced for GE15)	Yes	Polling Centre within DM Foh Sang
Jindo	Dewan Serbaguna Luyang	Yes	Yes	Yes	Yes	Polling Centre in DM Taman Fu Yun
Bukit Padang	Dewan Foochow	Yes	Yes	Yes	Yes	Found in DM Cenderakasih (DUN Inanam, Parliament Sepanggar)
Kepayan Ridge	Sekolah Menengah Maktab Sabah	Yes	Yes	Yes	Yes	Polling Centre within DM Kepayan Ridge
Taman Fu Yun	Sekolah Menengah Kebangsaan Taman Tun Fuad		Yes	Yes	Yes	Polling Centre found in DM Nosob (DUN Kepayan, Parliament Penampang)
Jalan Penampang	Sekolah Kebangsaan Sri Gaya	Yes	Yes	Yes	Yes	Polling Centre found in DM Foh Sang
Lido	Sekolah Menengah Kebangsaan Tinggi Kota Kinabalu	Yes	Yes	Yes	Yes	Polling Centre found in DM Kepayan Ridge

The map below shows the expected voter movement during polling day for DUN Luyang (for the 2025 Sabah State Elections)

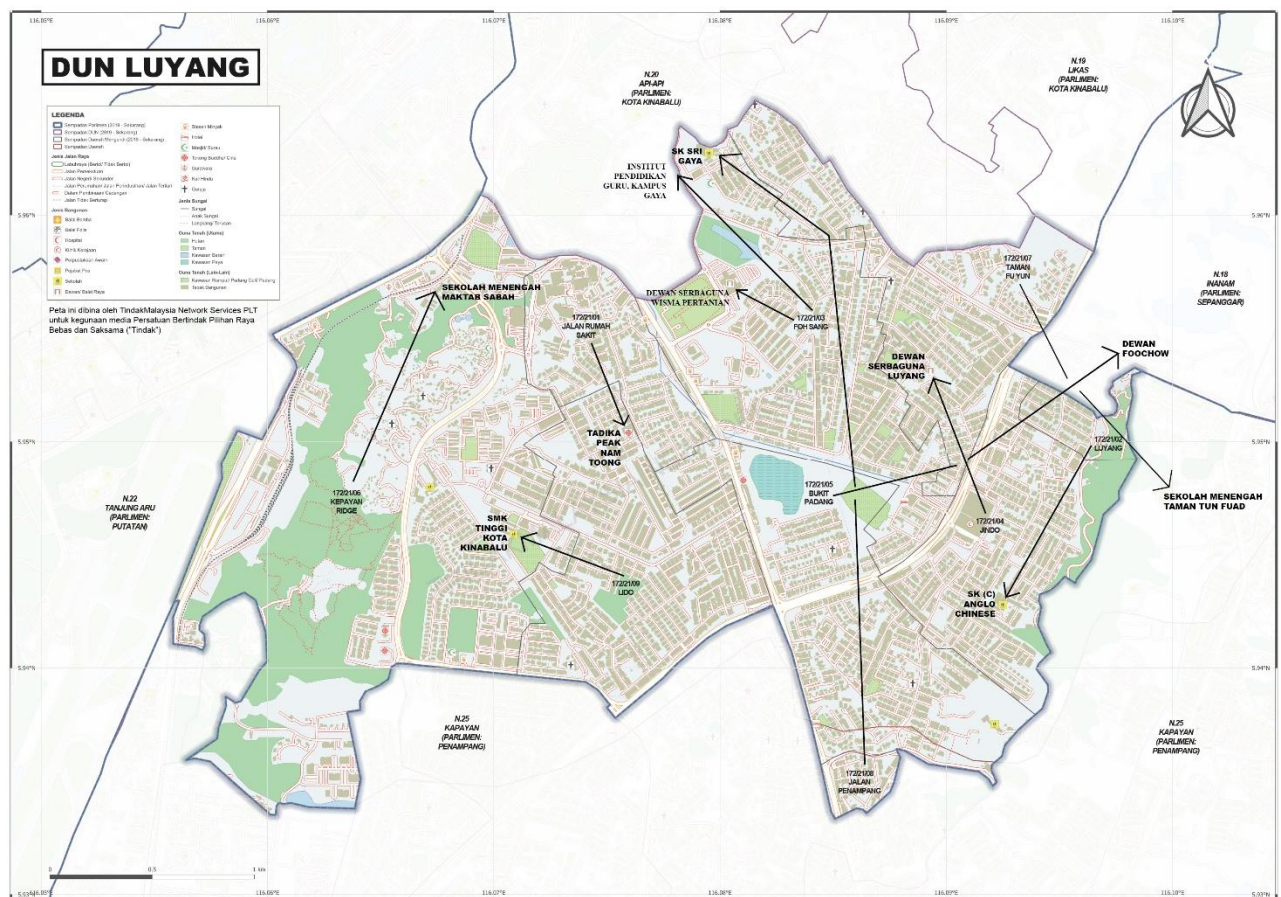


Figure 2: Current Allocation of Polling Centres to Polling Districts of DUN Luyang (reflective of GE15 (2022) and Sabah State Elections (2025)). Black arrows point to movement of voters for the various polling districts

Since 2019, Tindak has communicated these concerns to the EC through formal submissions, including our *Pemerhati* reports (such as Pulai 2023) and a comprehensive briefing with the full EC leadership on 14 January 2025. During this meeting, we stressed that every polling district should be designed with at least two in-district polling centres (meaning polling centre must be within the polling district). Because polling districts define where voters cast their ballots, it is crucial that the EC plans them carefully to minimise voter inconvenience and eliminate unnecessary cross-boundary movement.

While this statement focuses on DUN Luyang, we believe similar issues may affect other constituencies in Sabah and across Malaysia.

Despite our repeated engagements through proper channels, the EC has not acted on its fundamental responsibility: to facilitate ease of voting. On 22 November 2025, we have asked the EC to explain its inaction despite clear evidence and recommendations. As the EC has failed to address these issues since 2019, Tindak has no choice but to bring this matter to the attention of the public.

We call on the EC and all its state offices to take decisive steps to rectify polling-centre allocations in Luyang and beyond. With redelineation exercises pending for Sarawak, overdue for Sabah, and expected for Peninsular Malaysia, the EC must first fix the foundation: the polling

districts. Only with well-designed and accessible DMs can we ensure that constituencies remain accessible, representative and equitable

Failure to address these issues will continue to undermine public confidence in the EC and its role as the nation's election management body.

### **Committee**

### **Persatuan Bertindak Pilihan Raya Bebas dan Saksama (“Tindak”)**

**24 November 2025**

### **Sources:**

1. 2019 Polling District and Polling Centre Allocation -  
[https://lom.agc.gov.my/ilims/upload/portal/akta/outputp/pub\\_20190924\\_NOTIS%20DAERAH%20DAN%20PUSAT%20MENGUNDI%20SABAH%20DI%20BAWAH%20SEKSYEN%207\(1\).pdf](https://lom.agc.gov.my/ilims/upload/portal/akta/outputp/pub_20190924_NOTIS%20DAERAH%20DAN%20PUSAT%20MENGUNDI%20SABAH%20DI%20BAWAH%20SEKSYEN%207(1).pdf)
2. 2025 Polling District and Polling Centre Allocation -  
[https://lom.agc.gov.my/ilims/upload/portal/akta/outputp/3209341/PUB406\\_2025.pdf](https://lom.agc.gov.my/ilims/upload/portal/akta/outputp/3209341/PUB406_2025.pdf)