

Part B – Preparing for a European Parliamentary election

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1 Planning and risk management

A project management framework



The Local Returning Officer is **personally responsible** for the proper conduct and organisation of the election in their local counting area. This personal responsibility cannot be delegated. It is therefore essential that Local Returning Officers have formal, written plans in place with clearly defined objectives and success measures that allow them to monitor progress against those objectives and identify risks and corresponding mitigating factors.

1.1 Running an election is a complex logistical operation with statutory obligations and personal liability for Local (and Regional) Returning Officers, involving considerable financial and physical resources, and delivered against extremely tight and inflexible timescales.

1.2 Returning Officers should be able demonstrate that the systems used offer the management control that is necessary when delivering a statutory service. A project management framework enables a structured and methodical approach, including the identification, monitoring, assessment and proper management of risks.

Initial planning



Before considering the particular requirements of a European Parliamentary election, an essential part of project initiation is to undertake a thorough review of the effectiveness of the conduct of the last election and to consider any specific issues around changes in legislation.

1.3 The first stage of a review is most effective when done as soon as practicable after the last election, when most of the issues are still fresh in the minds of staff. It may be pertinent to invite some of the more experienced Presiding Officers and Poll Clerks to any discussion, along with 'first timers', in order to address all aspects of the process – from training to dealing with difficult situations on polling day. It may also be useful to survey all staff engaged at the election, perhaps through a post-election mail out, to find out about issues that arose, including the performance of Presiding Officers and Poll Clerks.

1.4 The scope of the review should cover all aspects of the election, but areas deserving particular scrutiny are likely to be polling places and polling stations, the quality of the register, the performance of contractors and suppliers, contract management, staffing, equipment and supplies, finance, security and integrity of the election, count arrangements, communications (both internal and external), and the management of postal votes.

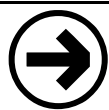
1.5 The first stage of planning is to then review all of the information gathered in the course of this review. Learning from the experience of the

previous election, even although the most recent one will not have been a European Parliamentary election, and considering the changes required are the key starting point for a well planned election.

1.6 Even if a post-election discussion did not take place last time, it is still worth reflecting on the previous election to try to identify any issues that can be addressed in advance of the next election. Noting down any issues that can be addressed in advance of an election and reviewing them afterwards will show what has been learnt from the experience and what, if anything, needs to be done differently in future.

1.7 The information collected through this review can be used to compile a project plan and a separate contingency plan. These 'living documents' are management tools that can be used to ensure that all eventualities are covered.

1.8 The project plan should be task based and should provide an overview of how the election is to be managed, including clarification of roles and responsibilities, risk assessment and management, lines of reporting and mechanisms for monitoring and ensuring quality. This is indicative only, and there may be other management issues that Returning Officers will want to include. Detailed plans should also be drawn up, that include all tasks, statutory and logistical deadlines, individual responsibilities, and appropriate identification and allocation of resources required.



The Commission has developed a template election planner and risk register, both of which are available on the Commission's website in Microsoft Word format, for administrators to adapt for their own use: www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators

Roles and responsibilities

1.9 Responsibility for the conduct of a European Parliamentary election is shared between the Returning Officer for each electoral region, referred to as the Regional Returning Officer, and the Returning Officer responsible for the conduct of the poll in each local counting area, referred to as the Local Returning Officer.

1.10 The **Regional Returning Officer** in each electoral region will be responsible for:

- the overall management of the election across the region, including agreeing effective lines of communication with Local Returning Officers
- preparing and publishing the notice of election
- all aspects of the nomination procedure
- receiving notices of appointment of election agents and sub-agents and publishing notices of such appointments

- determining the form of the ballot papers and, if the Regional Returning Officer so decides, printing and arranging the distribution of ballot papers to Local Returning Officers
- authorising the Local Returning Officer's announcement of the local count results
- calculating the results of the election within the region and allocating seats to candidates
- announcing the regional results and publishing the results of the election
- notifying the names and other details of elected MEPs to the Secretary of State

1.11 The Regional Returning Officer may give to any Local Returning Officer in their region directions relating to the discharge of their functions, including directions requiring the provision to them of any information which the Local Returning Officer has or is entitled to have.¹

1.12 This power of direction is to be used at the Regional Returning Officer's discretion. When issued by the Regional Returning Officer, it is the duty of the relevant Local Returning Officer to discharge their functions in accordance with the directions.²

1.13 The **Local Returning Officer** is responsible for the proper conduct and organisation of the election in their local counting area, but should act in accordance with instructions given by the Regional Returning Officer.

1.14 Local Returning Officers are responsible in their respective areas for:

- the conduct of the poll in their local counting area
- the printing of ballot papers, unless directed otherwise by the Regional Returning Officer
- the issue of poll cards
- the issue and receipt of postal ballot and postal proxy ballot papers
- the verification of personal identifiers
- the verification of the ballot paper accounts
- the counting of the votes in their area
- giving public notice of the result in their area once the result has been accepted and approved by the Regional Returning Officer
- taking appropriate steps to encourage participation by electors in the electoral process

1.15 The Local Returning Officer is required to appoint a Presiding Officer for each polling station in the counting area, and may appoint as many of the following staff as needed to assist in the conduct of the election:

- deputy Local Returning Officers (see 1.19)
- staff for the issue and receipt of postal votes
- Poll Clerks

¹ Regulation 9(3), EPE Regulations.

² Regulation 9(4), EPE Regulations.

- counting staff
- other staff to assist with other duties as part of the election process

1.16 Local Returning Officers should give all appointed staff copies of Regulation 29 of the EPE Regulations 2004 which sets out secrecy requirements.

1.17 It is important to note that Returning Officers and their staff are not responsible for monitoring the conduct of candidates, agents, registered political parties, Nominating Officers or campaigners. If it is alleged that the conduct of anyone involved in the election process contravenes the law, the matter should be brought to the attention of the police. The Returning Officer and their staff must act impartially in their dealings with candidates and agents throughout the election.

1.18 The Local Returning Officer may not appoint for the purposes of the election anyone who has been employed by or on behalf of a registered party of individual candidate standing nominated at the election.³ The Local Returning Officer should seek an undertaking from those people proposed to be appointed that they have not been and will not be so employed.

1.19 Although the Local Returning Officer is personally liable for the conduct of the election, they may, however, appoint one or more Deputy Returning Officers, known as Deputes in Scotland, to discharge all or any of the functions of the office.⁴ They may be given full powers or specific powers appropriate to the tasks they will be required to undertake. There should be a formal written appointment and acceptance, including details of the powers granted, signed by both the Returning Officer and the deputy. If counts are to be held at different venues, a deputy must be appointed for each venue.

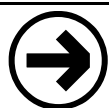
1.20 It is essential that a senior officer is identified to manage both the preparations for, and day to day conduct of, the election. However, the ultimate responsibility and final decisions must rest with the Local Returning Officer.

1.21 The project plan should identify the roles and responsibilities of all those tasked with delivering particular aspects of the election, and should clearly document reporting lines. These may be quite different to reporting lines in the normal council structure. It is important that the Local Returning Officer ensures that election work is given the utmost priority by the council as a whole.

1.22 It is vital that each member of the election team understands their particular role and any statutory obligations associated with the work they are undertaking.

³ Rule 30(1), EPE Rules.

⁴ Throughout this manual, all references made to 'deputy Returning Officer' should be read as 'depute' in respect of Scotland.



See Part A, 'Context' for an explanation of the roles and responsibilities of relevant officers, including the split of functions between Returning Officers at combined county and European Parliamentary elections.

Preparing contingency plans

1.23 By reviewing the conduct of the previous election, any difficulties and problems and the measures taken to resolve them will already have been identified. In addition to this, it is essential to list all the possible risks to the safe delivery of the election, identify what can be done to ensure that such risks do not occur, and develop contingency plans with options for dealing with such eventualities if they do arise.

1.24 A contingency plan should also identify the seriousness of any risk, by reflecting both the likelihood of the risk occurring and the impact of such a risk if it did occur. For example, if a ballot box was missed and its contents not included in the verification and/or count, this would have serious consequences for the integrity of the election result and therefore represents a high level of risk for the Local Returning Officer personally.

1.25 The key objective of identifying risks is to manage those risks. There is considerable expertise within local authorities in identifying and managing risk that could be called upon to assist with the drawing up of a detailed election contingency plan. Prevention is better than cure, and in many cases electoral law does not provide for a remedy other than by way of election petition.

1.26 In order to assist Local Returning Officers in the task of identifying and managing risks and developing a contingency plan, a template contingency plan is available on the Commission's website. This gives some examples of possible risks and can be adapted to fit local circumstances, as there may be risks specific to a particular area and circumstances, which will need to be identified and managed.

Correction of procedural errors

1.27 Regional and Local Returning Officers are permitted to correct procedural errors made in connection with their functions by either themselves or by an Electoral Registration Officer, a Presiding Officer, a person providing goods or services to the Regional Returning Officer or Local Returning Officer, or any deputy or authorised assistant of any of the above.⁵

1.28 A Regional Returning Officer or a Local Returning Officer will not be guilty of an act or omission in breach of official duty if they 'remedy the act or omission **in full**' by taking steps under this power.⁶ Therefore, this power can be used to remedy administrative errors that might otherwise have resulted in a breach of duty. It would still, however, be for the courts to decide if the act or omission had been remedied 'in full', and both Regional and Local Returning

⁵ Regulation 9(4A) EPE Regulations.

⁶ Regulation 9(5) EPE Regulations.

Officers should ensure that they document clearly any problems encountered in the conduct of the election and any decisions and actions taken to remedy those situations, as this provision does not remove the risk of challenge to the election or a finding by a court of breach of duty.

1.29 It is also important to note that this provision does not allow a Regional or Local Returning Officer to re-count the votes given at an election after the result has been declared.⁷ Once a result has been declared, regardless of whether it is correct or not, it is final and only subject to challenge by an election petition, and the ability to correct procedural errors does not vary this principle. Returning Officers should ensure that they properly manage the risk of incorrect declarations of results by following robust procedures during the count.

Insurance

1.30 As they are personally liable, Local Returning Officers should ensure that they have adequate insurance cover. The Ministry of Justice (MoJ) are investigating the practicalities and costs associated with purchasing aith insurance or an indemnity for Local Returning Officers.



Advice from one insurer during the local government elections in England in 2006 highlighted that in the event of difficulties arising and plans having to be changed, accurate records should be kept of decisions taken and the reasons why actions were undertaken.

It was stated that these records could be very useful if decisions or election results were to be challenged at a later date. Regardless of which insurer provides the cover, it is suggested that Returning Officers adopt this approach in their normal working practices.



For further information, email Paul Brunton, MoJ, at paul.brunton@justice.gsi.gov.uk, or call 020 3334 3778, or write to:

Election and Democracy Division
Ministry of Justice
7th Floor
102 Petty France
London SW1H 9AJ

Reporting methods and techniques

1.31 As indicated above, in order to ensure effective management of the election it is essential that there is central coordination of all election preparations and activities. Clear lines of communication with all levels of the election management structure at an early stage should ensure that suitable reporting structures are established and maintained by all staff engaged in the day to day running of the election.

⁷ Regulation 9(4B), EPE Regulations.

1.32 The following list provides examples of reporting methods and techniques which, from experience, electoral administrators have found to be useful:

- a timetable or an election planner to check on progress
- exception reports that show where tasks are slipping behind schedule
- update reports of performance of contractors, including time, quality and cost
- regular team meetings
- structured agendas for meetings
- minutes and action points from previous meetings
- estimated spend charted against fees available
- resource plan – availability and competency of trainers and staff, and any special arrangements for the allocation of staff to polling stations, for example where there is a particular language requirement in an area where there is a large number of electors whose first language is not English
- reports on specific issues, or requiring particular expertise – for example, legal advice, security, or arrangements with the police, broadcast media and press

1.33 It is vital to agree, at an early stage, clear arrangements for the method and frequency of reporting between the Regional Returning Officer and the Local Returning Officer and between the person managing the day to day conduct of the election and the Local Returning Officer, and any deputies. This communication may be daily, weekly or exceptionally in the event of there being a major problem.

1.34 The person managing the day to day running of the election needs to have a sound knowledge of their own team to ensure that an effective communication process is in place and is robust. Local Returning Officers should make a point of discussing election planning with that team early in the preparation phase and on a regular basis throughout the conduct of the election.

Planning for post-election activities

1.35 The planning process should include an evaluation phase to take place soon after the election in order to review the effectiveness of its conduct as detailed above and to draw out any learning points for the future, while the experience is relatively fresh.

1.36 It would also be beneficial to alert candidates and agents to your plan to conduct a review, and to invite their comments.

1.37 In addition, the provision of feedback forms for polling station staff and electors, to indicate if there were any problems or issues with the polling station venues, can provide valuable information for future planning. A similar approach to the arrangements for dealing with postal votes and the count may also be helpful.

Electoral forms and equipment

1.38 Elections require a substantial amount of election-specific and general stationery and equipment. Reviewing the previous election should enable the Local Returning Officer to determine the effectiveness of materials and equipment used, and to audit current supplies of key items, such as polling booths and ballot boxes. This information can then be used to inform estimates for re-ordering stationery and replacement election equipment.

1.39 It should be noted that the Welsh Language Act 1993 places responsibility on Returning Officers in Wales to provide bilingual election material to electors.

2 Managing contractors and suppliers

Roles and responsibilities

2.1 Local Returning Officers can outsource particular work required to deliver a European Parliamentary election, but not the responsibility for ensuring compliance with the rules and regulations. The duties and obligations for the effective conduct of the election remain those of the Local Returning Officers. We strongly advise that Local Returning Officers and their staff come to their own independent view of the statutory requirements for any outsourced work and that they check that any such work meets all the statutory requirements.

2.2 To operate effectively, the administration of an election needs to be properly resourced with well trained staff who have a sufficient level of knowledge and expertise, both of the statutory requirements of election management and of procurement and contract management procedures. It is vital for the statutory requirements and their implications to be fully explained wherever contractors are used, in order to avoid any misunderstandings later.

Procurement

2.3 The review of the previous election, together with any recently arising circumstances, will inform the decision to outsource a particular function or task. The risks of outsourcing should be clearly identified and documented, with contingency built into the procurement and contract management process.

2.4 The earlier that decisions to outsource are taken, specifications prepared and appropriate companies invited to tender for the work, the better. As more electoral work is outsourced, the more quickly the suppliers of such services become booked up and reach their total capacity. Given the inflexibility of the election timetable, suppliers should be identified and engaged as far in advance as possible.

2.5 It should be made clear to contractors that they should be producing work according to the specifications set by the Regional or Local Returning Officer. In some instances, electoral offices have asked contractors what is acceptable and should be done, or have been told that something cannot be done when requested. Any query about the design of ballot papers or other electoral materials should be concluded by the electoral staff themselves, by reference, as necessary, to the Regional Returning Officer, the relevant legislation and Commission guidance, by contacting the Commission or by reference to other experienced electoral staff. It should be noted that any failure by a contractor to comply with electoral legislation is the personal responsibility of the Regional and Local Returning Officer.

2.6 The local authority will have adopted standing orders or regulations relating to contracts and procurement. A number of councils now use e-procurement to order and pay for their goods. It is advisable to take advice

on the procedures to be followed, although Local Returning Officers must bear in mind Electoral Claims Unit (ECU) or Scotland Office guidance and other legal requirements for procuring supplies and services.

2.7 It is generally agreed that it is good public procurement practice to obtain at least three written quotations. Some councils may, however, have a standing list of approved contractors who have already been through the tendering process and, in some instances, it may be more effective and economical to use such existing contractors and systems.

2.8 As a minimum, it will be necessary to draft a detailed specification of requirements, providing clear instructions as to the necessary statutory obligations in relation to the particular work or services to be undertaken. This specification should be provided to all those companies invited to tender for the work. The successful company must be able to meet all the requirements of this specification.

2.9 In arriving at a decision as to the selection of a company to deliver the work, the Local Returning Officer should ensure that they understand and have evidence of the level and nature of the experience and suitability of the company to undertake the work being outsourced. Local Returning Officers should also satisfy themselves that the company will have the capacity to complete any contracted work to the required standard. It is recommended that formal references are taken up, and examples of previous electoral work are provided and reviewed. It is also essential that appropriate checks are made against the company's statements relating to such matters as insurance, contingency planning and capacity, quality control, security, health and safety, etc.

2.10 Additionally, it is vital to be aware of whether the company being considered for the work will be using sub-contractors to deliver any aspect of that work. This will create another level of risk and additional communication lines. The Local Returning Officer will need to be reassured that the sub-contractors are capable of delivering the work and that appropriate quality assurance processes are in place.

2.11 A final quotation from the company selected should be obtained, including every aspect of the work as detailed in the specification. Any variations agreed with the company should be in writing and accepted by both parties. A formal contract should be drawn up and it is advisable to do this with advice from the council's legal services or procurement unit.

2.12 The final price of the contract should not be the only consideration in choosing a contractor. The focus should be on 'value for money'. Electoral work must be completed on time and to a high standard, and the Local Returning Officer should therefore carefully consider what each bid offers.

2.13 In England and Wales, grants towards the costs of purchasing polling compartments and ballot boxes can be obtained from the ECU. In Scotland, these can be obtained from the Scotland Office. Claims for the cost of replacing polling screens should be submitted to the ECU or the Scotland

Office on the approved application form. Approved claims will be reimbursed, the payments being regarded as advances towards the expenses of the European Parliamentary elections. In Scotland, the Scotland Office can provide advances for the purchase of required equipment. Local Returning Officers can then seek reimbursement through the fees and charges order.

2.14 While polling screens or compartments bought with the help of a Treasury grant do not belong to the council, they are usually stored by the council and may also be used for local government elections.

2.15 The Local Returning Officer is required to supply each polling station with such number of ballot papers as they consider necessary.⁸ Careful consideration needs to be given to the number that will be required. Any Local Returning Officer who has difficulties in getting ballot papers printed should contact the nearest regional director of the British Printing Industries Federation, contactable through www.bpif.org.uk

Outsourcing the production of postal ballot packs

2.16 In terms of outsourcing the production of postal ballot packs, Local Returning Officers should note that, unless the Regional Returning Officer otherwise directs, they are responsible for printing the ballot papers. Whatever the case, Local Returning Officers should liaise closely with the Regional Returning Officer to ensure that any proposed stationery complies fully with the requirements of the legislation, including the postal voters list, prescribed form of ballot paper, postal voting statement, official mark and envelopes to be used.⁹



Combination

Local Returning Officers with combined elections will need to decide whether they will do a combined issue of postal votes or organise separate issues for each election. Suppliers should be informed as soon as the decision has been made. Whichever decision is taken, it should not be based exclusively on cost and the saving of administrative effort, but should primarily be concerned with the impact on voters.

2.17 A postal ballot paper must be the same as a polling station ballot paper. All ballot papers should be produced on paper of a sufficient quality to prevent the voters' marks, including those made with pens etc., being seen – particularly during postal vote opening sessions and during the verification of votes, where the ballot papers must always be kept face down.

2.18 The design of the ballot paper must follow that set out in the election rules.¹⁰

2.19 Ballot papers no longer require to be printed with a counterfoil; a corresponding number list must now be used instead.

⁸ Rule 32(1), EPE Rules.

⁹ Rules 22 and 28, EPE Rules. Paragraphs 5, 42 and 50; Schedule 2, EPE Regulations.

¹⁰ Rule 22, EPE Rules.

2.20 All postal ballot papers must contain an appropriate security marking, known as the 'official mark', and another unique identifying mark. If the Regional or Local Returning Officer wishes, the official mark used on postal ballot papers may be the same as that used at the polling stations, but it does not have to be.¹¹ The official mark does not have to be a perforation added at the time of issue of the ballot paper; it could be the printing of an emblem or mark or a special printing device such as a watermark. If, however, the Regional or Local Returning Officer does not choose to use a printed mark such as a watermark or an underprint, the ballot papers may be stamped with a perforating official mark. The regulations do not, in our view, stipulate at what time the mark must be applied. Regional and Local Returning Officers should, however, ensure that the secrecy of the official mark is maintained. Whatever form of official mark is used, the mark must be appropriate to ensure security and prevent copying. Once a mark is used, it cannot be reused for another five years in the same local counting area.¹²

2.21 In addition to being numbered, all ballot papers, including those to be issued at polling stations, **must** bear a further unique identifying mark, which must be unique to each individual ballot paper. This mark can be letters and numbers and could, for example, be the ballot paper number with the addition of a prefix or suffix. An example may be 'E ATC 1', to indicate a E(uropean) Parliamentary election (in case it is combined with another type of election) in the A(ny) T(own) or C(ity) local counting area, with the ballot paper number '1' being printed as a suffix. It should be noted that the use of the number '1' is in addition to the printing of the number '1' in the ballot paper number section of the ballot paper. Also, a unique identifying mark can be, but does not have to be, a barcode.

2.22 Decisions on what to use as the official mark and unique identifying mark, in particular whether to use similar marks across the region or across the local counting area, should be made at an early stage in the preparation process.

2.23 When outsourcing postal vote production, all data, including the unique identifying mark, should be included in separate fields in the data file. Every separate piece of information (remembering that the unique identifying mark and ballot paper number are two separate pieces of information) should be a separate field or column in the data file. Electoral administrators should ensure that their software is able to produce a data file that their printers can easily use to produce material to the specification required. Local Returning Officers should agree early on with their suppliers the format in which they are to supply ballot papers or postal voting statements.

2.24 Sample data, including the data headings, should be provided to printers at an early stage in the process, well in advance of 'live' data being submitted, in order that the data format can be worked on. This will also enable pre-proofs to be developed so that it is clear which part of the data should go where on the ballot paper or envelope.

¹¹ Rule 24(3) EPE Rules.

¹² Rule 24(2) EPE Rules.

2.25 There must be two separate envelopes in the postal ballot pack:

- an envelope that must be marked with the letter 'B' for the return of the ballot paper envelope and postal voting statement
- a ballot paper envelope that must be marked with the letter 'A', the words 'ballot paper envelope', and the number of the ballot paper

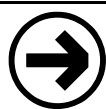
2.26 The form of the postal voting statement is prescribed, and so the Local Returning Officer should consider whether they need to deviate from the wording and format of the prescribed form for a legitimate reason before doing so.¹³

2.27 In addition to the ballot paper, postal voting statement and envelopes, Local Returning Officers may include such information as they think appropriate about how to obtain:

- translations into languages other than English and, in Wales, Welsh, of any directions or guidance for voters sent with the ballot paper
- a translation into Braille of any such directions or guidance
- graphical representations of any such directions or guidance
- the directions or guidance in other forms (including audio)¹⁴

Contract management

2.28 It is essential that there is a formal, written contract or agreement for the work, as this can be used to ensure that quality assurance is carried out effectively. As discussed earlier in this section, local authorities have formal procedures for procurement and the letting of contracts, which the Local Returning Officer may utilise and/or adapt. Experienced managers in these fields can be used to ensure that appropriate and rigorous contract management procedures are followed, thereby minimising risk.



The Improvement and Development Agency (I&DeA) provides model contracts on their website that could be adapted for use by Local Returning Officers: www.idea.gov.uk/idk/core/page.do?pagelid=5829996

However, Local Returning Officers should always seek legal advice when drafting contracts.

2.29 The timescales for the company to undertake and deliver the work should be confirmed in advance. All stages of the process should be well documented and continuous communication is important for both parties. Maintaining open lines of communication between the contractor and the Local Returning Officer is key to the successful and timely delivery of any contracted work.

¹³ Rule 28, EPE Rules; Paragraph 42, Schedule 2, EPE Regulations.

¹⁴ Regulation 122A, EPE Regulations.

2.30 Ensure that there are specific provisions within the contract for the Local Returning Officer, Regional Returning Officer, or nominated member(s) of staff, to visit the company's premises (including those of sub-contractors, if appropriate) so as to be present while the work is being carried out, and to be able to quality check the ballot papers, postal ballot packs or other work. In addition, contractual provision should be made to allow for Commission representatives and officially accredited observers to attend the company's premises to observe the process.¹⁵

2.31 Ensure that there are specific provisions within the contract relating to secrecy – the appropriate notice as to secrecy should form part of the contract, with a requirement that the company provides this notice to all staff. This must include any sub-contractors used to deliver the work.¹⁶



Ensure that the Regional or Local Returning Officer remains in control of the process and that the company contracted to do the work does not make any decisions without their full understanding and authorisation. Any variations from the agreed specification could result in a breach of statutory rules and regulations, and therefore potentially a breach of duty. Any variations should therefore be formally documented and signed off by or on behalf of the Regional or Local Returning Officer.

2.32 In order to assist contractors and suppliers in delivering the work on time, it is essential to keep to agreed timescales for providing the information or data they need to do the job. If there is slippage, for example because of the time required to process bulk last minute postal vote applications, there will be a need to advise the contractors straight away.

2.33 Document all stages of the procurement and production processes. In particular, keep a formal record of the production process in order to be able to demonstrate that it was undertaken in accordance with the law.

2.34 Specifically, it is recommended that contracts should include clauses which allow for the following quality assurance measures, in addition to those contained within the printer's own procedures:

- There should be full disclosure of any sub-contractors and their role. This should include full access to all sub-contractors during the production process.
- Clear lines of communication should be maintained between any contractor, any sub-contractors and the Regional or Local Returning Officer and their staff.
- All senior and supervisory staff who will be involved in the process should attend a briefing session at least seven days prior to printing and issuing.
- The Regional or Local Returning Officer and their nominees should have access at all times to all parts of the printing, collation and packaging

¹⁵ Sections 6A–6F, PPERA.

¹⁶ Regulation 29, EPE Regulations.

process, and should be able to carry out quality checks on print runs, collations and completed materials.

- The Regional or Local Returning Officer should be provided with proofs of all items to be included in the ballot pack to sign off before printing begins. The proofs should be provided both electronically and in hard copy format. Should the proofs not be acceptable at any point in the process, revised proofs should be prepared within a set number of days, to be specified in the contract.
- Final printed versions should always be checked and Local Returning Officers should have a system in place that allows them to be satisfied that the right documentation has been included in the postal ballot packs.
- There should be provision for an adequate number of replacement ballot packs to be produced and a fixed date for these to be delivered to the Regional or Local Returning Officer.
- Local Returning Officers should ensure that there is no direct communication between the contractors and Royal Mail without the knowledge and involvement of the Regional or Local Returning Officer; printers should only communicate with the relevant Returning Officer or their authorised representatives (which could include Royal Mail at the discretion of the individual Returning Officer).
- Contractors should seek permission from the Regional or Local Returning Officer before releasing any ballot packs to Royal Mail and should follow the handover procedures prescribed by the Returning Officer. The Regional or Local Returning Officer or nominee should be present at the handover.



Electoral register data held by the contractors should be destroyed following the handover of ballot papers to Royal Mail. A written undertaking should be signed by the contractors to accept that information from the full electoral register cannot be disclosed at any time, confirming that they will not disclose data to any unauthorised party and that, upon completion of the processing, they will return any discs and paper records provided to them and destroy any other electronic or paper copies of the data.

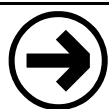
2.35 If it is problematic to find a suitable contractor, then the British Printing Industries Federation (BPIF) may be contacted for assistance:

British Printing Industries Federation
Farringdon Point
29–35 Farringdon Road
London EC1M 3JF

Tel: 020 7915 8319
www.britishprint.com

Working with Royal Mail

2.36 Regional and Local Returning Officers are advised to contact their Royal Mail Account Manager as soon as possible, and to ensure that they have an up to date copy of Royal Mail's best practice guidance on postal voting, *Managing postal voting*.



The Commission's website provides a link to Royal Mail's best practice guidance on postal voting at www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/european-parliamentary-elections

2.37 When using Royal Mail it is important to liaise with the Account Manager on a regular basis and obtain any licence numbers and Business Reply numbers as soon as possible in order to avoid any delay at the time when the postal ballot packs are to be distributed to electors. It is also important to discuss arrangements for collection of postal votes at an early stage.

Freepost¹⁷

2.38 Every registered political party and individual candidate standing at a European Parliamentary election is entitled to free postage on an election address to be sent out across the electoral region. Registered political parties or individual candidates wishing to make use of this provision should be advised to contact Royal Mail to make arrangements.

2.39 The Local Returning Officer is required to make arrangements for sending freepost election material from parties and individual candidates to anonymously registered electors. This will require using the list of anonymous electors to produce envelopes for sending the material to these electors. The envelopes must be sent by the Local Returning Officer as the details of anonymously registered electors cannot be given to parties, candidates or Royal Mail. All materials must comply with Royal Mail specifications for freepost arrangements, and so it may be advisable to wait for confirmation that the material has been sent out by Royal Mail to other electors to ensure that it satisfies the freepost requirements.

¹⁷ Regulation 63, EPE Regulations.

3 Election finance

3.1 Guidance on the fees and charges order, including forms and related procedures, will be provided by the Ministry of Justice and published at www.justice.gov.uk/guidance/european-elections-june-09.htm

3.2 Before the election it is important to consider how the election accounts will be prepared, for example whether the election management software has a suitable programme or whether spreadsheets of payments are needed. Also, to aid transparent accounting, there should be a clear division of duties between any officers ordering goods and services and officers authorising payments.

3.3 Adequate documentary evidence that the costs have been properly incurred should always be provided when making a claim. Returning Officers should also make use of Internal Audit or other independent scrutiny before submitting their claims.



Combination

Where functions are common to the European Parliamentary elections and any other elections with which they are combined, the costs will need to be split and further guidance should be sought from the Ministry of Justice.

Returning Officers in England with combined European Parliamentary and local government elections should also consult the election finance section in part B of the Commission's Returning Officer manual for local government elections in England and Wales. Additional copies can be downloaded from the Commission's website at www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/local-elections/local-government-elections-in-england

4 Equal access

4.1 Equal access to elections is an essential part of a healthy democracy and is necessary to ensure high levels of voter participation. It is therefore very important that all electors have the same opportunity to cast their votes. The purpose of this section is to provide Local Returning Officers with an overview of legislative requirements covering accessibility and to offer guidance on good practice.

4.2 Access issues should be taken into consideration for all electoral procedures, when planning for an election, on polling day itself and during the electoral registration process. It is important for Local Returning Officers, Electoral Registration Officers, electoral administrators and polling station staff to use their own judgement and common sense when resolving access issues. With the diversity of local authorities and types of access issues encountered, it is very difficult to provide 'one size fits all' guidance.

Planning for access

4.3 Forward planning is essential if maximum accessibility is to be achieved. This should include not only access to polling stations and the count venue, but also access to the entire electoral process, voter information and polling day.

4.4 Reviewing the last election will provide learning points to feed into future planning. It may be that an unforeseen access issue did occur on polling day. If so, steps should be taken to prevent it reoccurring in the future.

4.5 In such a review, the Local Returning Officer may wish to consider the following points:

- All reports returned by Presiding Officers should be considered and any problems identified.
- It is also important to consider what practices were successful and where these can be used elsewhere.
- Feedback from electors can highlight any issues that may have occurred. Questionnaires with a predetermined checklist could be made available at polling stations for use by electors.
- Feedback from candidates, agents and political parties may also help to highlight issues or examples of good practice. Candidates, agents and their supporters have much and varied contact with electors throughout the election period and may receive feedback which they can subsequently give to the Returning Officer and the election team.
- Feedback from local organisations of disabled people, older people, minority ethnic groups and the council's access officers could also be sought.

4.6 An action plan should be drawn up to overcome barriers to access in time for the next election.

Legislation

The Disability Discrimination Act 1995

4.7 Electoral procedures are not specifically mentioned in the Disability Discrimination Act 1995 (DDA). The Commission, however, supports the view that the voting process is a public service. In its response to *Voting for change*, the UK Government stated, 'We take the view, as does the Electoral Commission, that the Disability Discrimination Act 1995 applies to the provision of the facilities for polling.'¹⁸ As a result, it is our view that Returning Officers must not discriminate against disabled people by providing a worse service to a disabled person than they would to a non-disabled person.

4.8 Since December 1996, it has been unlawful for a service provider to discriminate against a disabled person. Discrimination includes:

- refusing to provide any service to disabled people that it provides to non-disabled people
- providing a worse standard of service to disabled people than it provides to non-disabled people

4.9 Since 1 October 1999, service providers have had to change practices, policies and procedures that make it impossible or unreasonably difficult for disabled people to use a service. What is 'reasonable' will be decided by the courts, but until there is a body of case law, this will be difficult to define.

4.10 From 1 October 2004, service providers have had to make reasonable adjustments to the physical features of their buildings to overcome physical barriers to access. This covers many of the buildings used as polling stations, as they are in use for a wide variety of other functions. The provisions in Part III of the DDA 1995, which cover access to goods and services, apply to electoral services.

4.11 The DDA 1995 has now been amended by the Disability Discrimination Act 2005, which places a duty on all public sector authorities to promote disability equality, and required councils to publish a disability equality scheme by 4 December 2006.

4.12 The disability equality duty, which came into effect in December 2006, places a duty on all public authorities, when carrying out their functions, to have due regard to the need to:

- promote equality of opportunity between disabled persons and other persons
- eliminate discrimination that is unlawful under the Act
- eliminate harassment of disabled persons that is related to their disabilities

¹⁸ *The Government's response to the Electoral Commission's report: Voting for change – An electoral law modernisation programme*, www.dca.gov.uk/elections/govresp-vfc-cm6426.pdf

- promote positive attitudes towards disabled persons
- encourage participation by disabled persons in public life
- take steps to take account of disabled persons' disabilities, even where this involves treating disabled persons more favourably than other persons

4.13 Regional and Local Returning Officers should have regard to the disability equality schemes of the councils in their local counting area when approaching these issues.

Race Relations Act 1976

4.14 The Race Relations Act (RRA) 1976 gives local authorities various duties in respect of race equality. The general duty set out in Section 71(1) of the Act and the statutory Code of Practice on the Duty to Promote Race Equality is to have due regard to the following three objectives:¹⁹

- eliminate unlawful racial discrimination
- promote equality of opportunity
- promote good relations between people of different racial groups

4.15 Councils are required to publish a race equality scheme. This lists the functions and policies assessed as being relevant to promoting race equality. The scheme also includes an explanation of arrangements for monitoring policies and services, consulting on them and assessing their impact on race equality, and for monitoring the workforce and key employment practices. Regional and Local Returning Officers should have regard to the race equality schemes of the councils in their local counting area when approaching these issues.

Language

4.16 Nomination papers and ballot papers are prescribed and must only be produced in English, or English and Welsh in Wales.²⁰

4.17 All other documents that are required to be displayed or provided to voters for the purposes of the election may, if the Local Returning Officer thinks appropriate, be translated into:²¹

- Braille
- languages other than English and, in Wales, Welsh
- graphical representations of the information contained in the documents
- other means of making the information contained in the documents accessible to persons who might not otherwise have reasonable access to the information (including audio)

¹⁹ Commission for Racial Equality, May 2002.

²⁰ Regulation 122A, EPE Regulations.

²¹ Regulation 122A EPE Regulations.

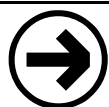
General issues – good practice

4.18 When considering access to electoral procedures, it is vital to think about the demography of your own area and the access needs of voters. For example, are there large numbers of older voters? Are there specific groups of minority ethnic electors and, if so, what languages do they speak?

Communities vary significantly throughout the UK, with different groups of minority ethnic electors and age profiles. It is also important to consider the geography of the area, including whether it is urban or rural. It is very important that any changes with regard to access issues benefit everyone, rather than a few at the expense of others. Access issues should be seen in the context of the election as a whole.

4.19 When considering access issues, it is always helpful to talk to local organisations of disabled people, older people and minority ethnic groups. They may have first-hand experience of electoral procedures and may be able to suggest alternative venues for polling stations or ways in which election literature can be improved.

4.20 It is important that there are channels available for voters to contact election staff directly, so that they can put forward their views for consideration. It can also be useful to speak to disabled employees forums, where they exist in individual local authority areas. Professional advice can be obtained from an access auditor.



Guidance on promoting access issues and making information accessible is included in Section 9, 'Publicity and the media'.

Guidance and advice

4.21 Guidance and advice on access issues are available from council access officers and a variety of organisations, some of which are listed below. In addition, local groups for disabled people and those from minority ethnic communities may also be able to offer advice and assistance.

Equality and Human Rights Commission

4.22 The Equality and Human Rights Commission replaced the Commission for Racial Equality, the Disability Rights Commission and the Equal Opportunities Commission. Set up under the Equality Act 2006, it is a non-departmental, publicly funded body that promotes awareness and understanding of human rights and encourages good practice by public authorities. It brings together the work of the previous commissions and covers England, Scotland and Wales. For further information, visit www.equalityhumanrights.com

Plain English Campaign

4.23 The Plain English Campaign is an independent pressure group whose aim is for public information to be written in plain English – that is, language that the intended audience can understand and act upon from a single reading. The Campaign offers editing services as well as the Crystal Mark for approved documents. Further information is available at www.plainenglish.co.uk

Royal National Institute for Deaf People (RNID)

4.24 The RNID represents deaf and hard of hearing people in the UK. They can provide information on communicating with deaf people. More information is available at www.rnid.org.uk

Royal National Institute of Blind People (RNIB)

4.25 The RNIB offers information, support and advice to people in the UK with visual impairments. The RNIB has produced clear print guidelines to improve access for blind and partially sighted people.

4.26 The RNIB can also offer guidance on producing tape recordings, Braille, e-text and accessible websites. Further information on these issues is available at www.rnib.org.uk

Scope

4.27 Scope is a disability organisation working throughout England and Wales. In Wales, it is known as Scope Cwmpas Cymru. Its aim is for disabled people to achieve equality. Scope runs the Polls Apart campaign to make elections accessible to disabled voters and reports have been produced on all UK Parliamentary general elections since 1992. Scope has also produced a range of guidance for staff involved in elections. Further information is available at www.scope.org.uk

Capability Scotland

4.28 Capability Scotland works with local authorities and disabled people to improve access to elections in Scotland and encourages disabled people to vote. Further information is available at www.capability-scotland.org.uk

Mencap

4.29 Mencap is a UK charity which campaigns for equal rights for children and adults with a learning disability. They also have experience in producing easy-read literature. Their website, www.mencap.org.uk, provides further details.

Electoral registration issues

4.30 Being able to register as an elector is fundamental to the whole election process. People may experience difficulties in completing electoral registration forms for a variety of reasons. They may not be able to see the writing on the forms or understand the form. This includes people with low levels of literacy, as well as those who do not speak or cannot read English. These people may need extra help in completing forms or to have guidance produced in an alternative format, if possible.



The Commission has produced an easy-read guide to voting, which includes a section on registration. Different packs are available for England, Scotland and Wales. Order details and a downloadable version of the guides can be accessed from the Commission's Do Politics website at www.dopolitics.org.uk

Registration forms

4.31 Where possible, all registration forms should:

- be in clear, precise English, and in Wales, Welsh
- give details of a helpline that people can ring if they require assistance – it is also helpful to provide a textphone number, website address and email address
- offer help with completing the registration form
- be printed in a clear font and using a minimum font size of 12 point wherever possible, although 14 point is more accessible
- preferably be printed in black ink on a white background
- be available in alternative formats on request

4.32 It can be useful to provide guidance notes explaining how to complete forms. This can be helpful to all electors and may make it possible to reduce the amount of text on the actual form. The guidance should be written in plain English and should include symbols and pictures. This will help all electors, including those with low levels of literacy or who have limited understanding of the process.

4.33 Alternative formats should be available, and these should be advertised on the form. Electoral Registration Officers can also offer help to those electors who have difficulties in completing electoral registration forms.



The Commission has produced forms for rolling registration in a variety of languages and formats. These are available as downloadable PDFs on the Commission website, www.aboutmyvote.co.uk, and can also be ordered as hard copies.

For further information on making registration accessible, see also Part I of our *Managing electoral registration in Great Britain: guidance for Electoral Registration Officers*. The relevant part can be downloaded from www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/electoral-registration/managing-electoral-registration-services

Access to the poll

Poll cards

4.34 Poll cards are one of the most important means of communication with electors. In some cases, electors may be unaware that an election is actually taking place until they receive a poll card. This being the case, it is important that poll cards are made easy to read, while containing as much information as possible.

4.35 It is now necessary to produce poll cards not only for those who are entitled to vote in person at a polling station, but also for those entitled to vote by post or by proxy.

4.36 Although the content of poll cards is prescribed, the following are some aspects of good practice you may wish to consider when producing poll cards.²²

- Poll cards should be produced in clear, large print, using a minimum of 12 point font size.
- Include a helpline number and an email address that people can use if they have any enquiries.
- Maps showing the location of the polling station can be helpful on poll cards for electors or proxies entitled to vote at the polling station, particularly if the location has changed since the last election, but any map should not be so small that electors have difficulty reading it.
- Include access details on poll cards for electors or proxies entitled to vote in person at the polling station (such as highlighting the availability of the device for enabling voters who are blind or partially sighted to vote without assistance or informing people that a temporary ramp will be in place), taking into account the size of the poll card to be used.

Postal and proxy voting

4.37 Although many people, including disabled people, prefer to vote in person, others find it more convenient to vote by post or to appoint a proxy to vote on their behalf. Postal voting is available on demand and anyone can

²² Rule 31, EPE Rules.

choose to vote by post without the need to supply a reason for selecting to vote in this way.

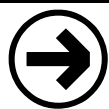
4.38 Additionally, there are legislative provisions allowing people who become disabled between the closing date for new applications to vote by proxy and 5pm on polling day to apply for an emergency proxy on the grounds of disability.

4.39 There should be adequate publicity surrounding postal and proxy voting to make people aware of these provisions and to inform people as to how to apply and the deadlines for doing so. Application forms should be located in a variety of public places so that people have easy access to them. Absent voting applications could also be produced in a variety of formats in order to make it easier for people to successfully complete the forms.

4.40 The Electoral Commission produces postal voting application forms in a number of languages and formats, including audio tape, Braille and large print. All foreign language leaflets are bilingual. These leaflets are available to order free of charge and are also available as downloadable PDFs on the Commission's website.

Polling places and polling stations

4.41 Unless there are special circumstances, polling places for the European Parliamentary election must be the same as those designated for UK Parliamentary elections.²³ The Representation of the People Act 1983 (RPA 1983) places an obligation on councils, so far as is reasonable and practicable, to designate as polling places only places that are accessible to disabled people and to give all electors within their area such reasonable facilities for voting as are practicable in the circumstances.²⁴ When carrying out reviews of polling places, councils are required to seek the views of people who have particular expertise in relation to access to premises or facilities for people who have different forms of disability.



Guidance on accessibility at polling stations is given in Section 6, 'Venues for election activities'. A checklist on accessibility issues for polling stations is included in our *Polling station handbook*, which can be ordered in hard copy or downloaded from the Commission's website.

Access for candidates, agents, Commission representatives and observers

4.42 As well as voters, candidates, agents, Electoral Commission representatives and accredited observers may have specific access needs for the election. They may need any guidance produced in a large print or other format, such as Braille or audio, or in a language other than English.

²³ Regulation 8(2), EPE Regulations.

²⁴ Section 18B, RPA 1983.

5 Electoral registration

5.1 This guidance should be read alongside the Commission's *Managing electoral registration services in Great Britain*, which is designed to assist Electoral Registration Officers with particular points of practice and procedure on electoral registration. This section is supplementary to that manual and highlights issues that will require particular consideration ahead of a European Parliamentary election.

Citizens of EU member states

5.2 Citizens of EU member states wishing to register as European Parliamentary electors must complete a separate application accompanied by a declaration, which must state that they will vote only in the UK at any European Parliamentary election during the 12 month period of the validity of the declaration.²⁵ EU citizens may only vote once and only in one member state at a European Parliamentary election, and to do otherwise would be committing an offence punishable on conviction by imprisonment of up to six months and/or a fine.²⁶

5.3 The Electoral Registration Officer should issue applications and declarations (commonly referred to as a 'UC1') to all electors who have indicated on the annual canvass form or rolling registration application that they are a citizen of an EU member state.

5.4 The Commission recommends that, wherever registration information is provided, the Electoral Registration Officer makes it clear that citizens of EU member states need to fill in a UC1 form if they wish to vote at the European Parliamentary elections in the UK. The Electoral Registration Officer could also use their website to make citizens of EU member states aware of this requirement.

5.5 In the period leading up to the deadline for registering to vote at the election, the Electoral Registration Officer could also send out UC1s alongside all rolling registration forms that are sent out. Alternatively, if a person calls the Electoral Registration Office asking for a rolling registration form during that period, staff could be instructed to always ask for that person's nationality (and the nationalities of other members of their household) to determine whether a UC1 needs to be sent out alongside the rolling registration form.



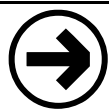
The Commission has produced application forms for registering to vote at European Parliamentary elections (UC1) in large print and a number of European languages (French, Latvian, Lithuanian, Polish, Portuguese and Spanish). These forms are downloadable from the Commission's website at www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/electoral-registration/forms

²⁵ Regulation 6, European (Franchise) Regulations 2001.

²⁶ Section 9, EPE Act 2002; Regulation 7, European (Franchise) Regulations 2001; Section 13D RPA 1983.

5.6 Returned applications and declarations should be dealt with in the same way as any other application and must meet the registration deadlines. While it is up to citizens of EU member states to decide whether or not they wish to register to vote at European Parliamentary elections in the UK, Electoral Registration Officers may want to consider sending out reminders to local government electors who are EU citizens and have not returned the UC1 form by a particular day close to the registration deadline.

5.7 Electors who return a completed declaration will have their names included in the register of electors prefixed with the letter 'K' instead of the letter 'G', which signifies that the person has been added to the register of European Parliamentary electors. This change from 'G' to 'K' should be reflected in the next update to the register.



Further details on franchise markers are provided in the *Handbook for polling station staff – supporting European Parliamentary elections in Great Britain* and in Part B of the manual, *Managing electoral registration in Great Britain*.

5.8 A person's application to register to vote as an elector at a European Parliamentary election in the UK remains effective for a period of 12 months from the date on which the entry in the register takes effect, or until.²⁷

- the citizen applies for their name to be removed from the register of electors, or
- another application is made by the citizen in respect of a different qualifying address, or
- the application is cancelled by the elector, which can be done at any time, or
- notification is received from the Secretary of State that information has been received from a member state indicating that the citizen has lost their right to vote



Further information and guidance on registration can be found in Parts D and F in the Commission's manual, *Managing electoral registration in Great Britain: guidance for Electoral Registration Officers*. This can be downloaded from the Commission's website at www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/electoral-registration/managing-electoral-registration-services

Information to the Secretary of State

5.9 Electoral Registration Officers will be required to send information on citizens of EU member states registered in their areas to other countries, and in turn should receive information from other EU countries.

²⁷ Regulation 10, European (Franchise) Regulations 2001.

5.10 Any directive and guidance relating to this information sharing will come from the Ministry of Justice, and any queries relating to this process should be directed to them.



For further information, email Paul Brunton, MoJ, at paul.brunton@justice.gsi.gov.uk, or call 020 3334 3778, or write to:

Election and Democracy Division
Ministry of Justice
7th Floor
102 Petty France
London SW1H 9AJ

6 Venues for election activities

6.1 Locating sufficient and appropriate venues for election activities is not always straightforward. The review of previous elections should include giving consideration to all such premises.

6.2 It is a good idea to contact the managers of all premises used as polling stations and count venues at least six months before the election date to alert them to the election and to make provisional bookings. When contacting the managers of premises, it is worthwhile asking them to complete a pro forma confirming the availability of the premises, caretaker/contact details and cost, and to provide a pre-paid envelope for its return.

6.3 This activity, done at an early stage in the planning process, should highlight where premises are no longer available or are not suitable. This will then allow sufficient time to act on the information and to identify solutions.

Briefings

6.4 It is good practice to arrange a meeting with representatives from political parties and any other possible individual candidates and their agents, if known, prior to the start of the election process, to provide them with information about the elections. Such briefings should be held in accessible venues.

Polling places and polling stations

6.5 It is the responsibility of the relevant council to designate polling places within their area and to keep these under review.²⁸ A review of polling districts and polling places should have taken place in 2007 and should be carried out at least every four years thereafter.²⁹ Reviews can be carried out at any time and some councils may wish to carry out their next review before 2011. In undertaking a review, councils will be required to seek the views of people who have particular expertise in relation to access to premises or facilities for people who have different forms of disability. In designating polling places, the council must therefore have regard to accessibility for disabled voters.

6.6 Although it is the responsibility of the relevant council to designate polling places and keep them under review,³⁰ it is the Local Returning Officer's responsibility to provide a sufficient number of polling stations within the designated polling places.³¹

6.7 The designation of venues for polling stations can be an extremely difficult exercise, because, on occasion, there may be no suitable premises within the polling district.

²⁸ Section 18A, RPA 1983.

²⁹ Section 18C, RPA 1983.

³⁰ Section 18A, RPA 1983.

³¹ Rule 29, EPE Rules.

6.8 Local Returning Officers should work closely with people who have particular expertise in relation to access to premises or facilities for disabled people. They should be able demonstrate that a proper assessment has been conducted of all the polling stations to be used at the election, and, where access problems exist, documentary evidence of any action taken should be retained.

Accessibility at polling stations

6.9 Despite the increase in postal voting, the majority of electors still vote in person at polling stations. Therefore, one of the most important aspects of equal access is to ensure that polling stations are as accessible as possible.

6.10 Ideally, Local Returning Officers will have the choice of a range of fully accessible buildings, conveniently located for electors in the area, with owners willing to hire them out for polling station use at low cost. Unfortunately, in practice, this is often not the case and, in many areas, there is very little choice available. Equally, it is not desirable to close down large numbers of polling stations and deprive electors of convenient local polling places because there are access issues.

6.11 However, in many areas, significant improvements have been made to premises used as polling places, to make them more accessible. Reimbursable advances are available from the Ministry of Justice or Scotland Office for temporary adaptations to premises used as polling places and, while not ideal, these can help more people to access a polling place.

Choosing buildings for polling station use

6.12 Traditionally, polling stations tend to be located in buildings such as schools, village halls and community centres. However, there is no reason why they should not be located in alternative buildings which have good access and have a suitable space that allows electors to vote in private. Premises as diverse as fish and chip shops, pubs, temples and supermarkets have been successfully used as polling stations. Whatever the case, it is essential that the premises identified provide sufficient space for voting to take place, including the space potentially required to accommodate polling agents and accredited election observers.

6.13 Local Returning Officers should remain vigilant for any new buildings which may provide alternative locations for any polling stations that present access problems. It may be that a new community building or hall has been built in the area that would prove to be the ideal polling station. Close liaison with accessibility experts will help to ensure that the best possible buildings are identified.

6.14 When initially choosing buildings to be used as polling stations or reviewing existing polling stations, the factors outlined below should be considered.

Location of the building

6.15 The location of the building is important when considering whether or not it should be used as a polling station. If possible, it needs to be close to where voters live and to be fully accessible. Questions to ask are:

- Is it located close to where most of the electors in the polling district live?
- Is it at the top or bottom of a steep hill?
- Does it have suitable access from a road?
- If there is a pavement, does it have a dropped kerb close by?
- Are there any convenient public transport links?
- Is it safe and well-lit?

Parking facilities

6.16 Many electors drive to the polling station, including disabled people, so provision of parking spaces at polling stations is important. Factors to consider are:

- Are there adequate parking facilities close to the entrance of the building? Where required, Local Returning Officers may also consider liaising with their local authority's transport department to discuss temporary parking arrangements.
- If not, is there anywhere close by that could be used for parking just on polling day?
- How far do electors have to walk from the car park to the polling station?
- Is there a designated disabled parking space, or could one be provided?
- Is there a dropped kerb from the parking area to the polling station?
- Will there have to be temporary parking restrictions introduced that allow poll staff to park nearby and voters, especially disabled voters, to park for a period to allow voting?

Pathways

6.17 The approach from the road and car parking space should have a hard, smooth, non-slip surface, without steps, potholes, broken slabs or similar; it should not have any severe gradients; and should be well lit. Gravelled surfaces can present difficulties to wheelchair users.

Entrance

6.18 When assessing access to the main entrance to the building, the following factors should be considered:

- Does the building have a level entrance?
- Are there any steps to the entrance of the building?
- Are the stairs highlighted in any way?
- Is there a handrail by the steps?
- Is a permanent ramp provided?
- If not, could a temporary ramp with a suitable gradient be provided safely, or is there another entrance that disabled people or other electors could use?
- Is the door wide enough for a wheelchair user to gain access?

- How heavy are the doors for a frail or elderly person to open? Would the doors need to be propped open?

Inside the building

6.19 When assessing access inside the building, the following questions should be considered:

- Are there any internal steps or barriers for electors to negotiate?
- Are doormats level with the floor? If not, can they be removed?
- Are there any other trip hazards?
- Is there a suitable non-slip floor covering? Would it become slippery when wet?
- Are there any corridors which may be difficult to negotiate for any electors using wheelchairs or those who find walking difficult?
- In terms of the layout of polling equipment in the polling station room, is there enough space in the room for staff, polling equipment and a number of electors, including a wheelchair user?
- Is there adequate lighting in the room? Switch on all the lights available to test this. Is there any need for additional lighting?
- If the premises have movable mats, heavy curtains trailing on the floor, a mix of carpet and wooden flooring with edging lips in between, and highly polished floors – all of which can be potential hazards – what has been done to remove or improve them?

Portable polling stations

6.20 Sometimes, there is no other option but to use a portable polling station, such as a Portakabin. Accessibility is a matter that should be discussed with suppliers of such accommodation. Local Returning Officers should also contact several different suppliers in order to compare what they can offer.

6.21 Loud generators that are sometimes used at portable polling stations can cause difficulties for deaf people when they vote, as well as being unpleasant for polling staff and people in neighbouring properties. Use of such generators should be avoided if at all possible.

6.22 There are several other considerations that will need to be planned for if portable polling stations are to be used, including making road closure orders, if necessary, to accommodate the stations, providing toilet facilities for staff, connecting an electricity supply if generators are not used, and accurately describing the position of the polling station on poll cards and on street signage.

Action to improve polling stations

6.23 Once any problems have been identified, it is important that action is taken to overcome them.



We recommend that Local Returning Officers prepare an action plan to identify improvements and ways of making them. Permanent improvements to buildings can benefit users throughout the year, and not just at election times. However, in order to achieve permanent improvements, funding needs to be identified. Some councils have provided access grants to bodies that own buildings which are used as polling stations, on the condition that they allow the premises to be used on polling day.

Polling station equipment, notices and supplies

6.24 As well as considering polling stations, it is also important to consider the equipment used inside the polling station well in advance of polling day.

6.25 Each polling station should be equipped with a low level polling booth for use by wheelchair users. Reimbursable advances are available from the Ministry of Justice or Scotland Office for polling booths for voters with disabilities. Grants are also available to cover a portion of the cost of temporary ramps, and these should be ordered well in advance of polling day.

6.26 Some Local Returning Officers provide magnifying glasses for electors to use when voting, and this can be useful to assist those electors with visual impairments. Polling booths should be checked to ensure that they have sufficient light to allow those with a visual disability to clearly read the ballot paper and instructions. If in doubt, supplementary light should be provided. It is also helpful to place white or luminous strips around the slots on the top of ballot boxes, to make it easier for people to see where to place their ballot papers.

6.27 Each polling station must be supplied with a tactile voting device.³² These should be ordered well in advance of polling day.

6.28 At least one copy of the large-print ballot paper must be displayed prominently at each polling station.³³ It is helpful to supply more than one large-print ballot paper for display in well lit and conspicuous locations in the polling station.

6.29 It is a legal requirement for the Local Returning Officer to provide an enlarged hand-held copy of the ballot paper (which must clearly be marked as a sample) for the assistance of voters who are partially sighted.³⁴ Laminating such samples will help to prevent them getting torn or dirty and it might be helpful to supply more than one copy for each polling station for voters to use.

³² Rule 32(5)(b), EPE Rules.

³³ Rule 32(5)(a), EPE Rules.

³⁴ Regulation 122A, EPE Regulations.

6.30 In addition, if the Regional Returning Officer or Local Returning Officer thinks it appropriate, all election notices and documentation, except for the ballot papers and nomination papers, may be translated into Braille and to languages other than English and, in Wales, Welsh. They can also use graphical representations or any other means of making the information accessible, such as audio.³⁵ For example, the 'guidance for voters' notice could be displayed pictorially or translated into languages widely used in the community.



Combination

Local Returning Officers with combined elections in their area will have to ensure that the relevant polling stations have been supplied with equipment and election stationery for both elections, including the large-print ballot papers and enlarged hand-held copies of the ballot paper and the relevant notices.

Booking polling stations

6.31 The cooperation of the owners of premises is important in ensuring that polling places are accessible. It may be helpful to ask owners if they are aware of any particular access issues with the premises which may cause difficulties on polling day. When booking polling places, it can be helpful to remind the owners of premises of the following:

- Any temporary ramps or other access facilities should be put in place for polling day.
- If there is a separate entrance to the building for disabled people, then this needs to be well signed and kept open for polling day.
- If the polling station has a polished floor, this should not be polished before polling day, in order to minimise the risk of voters slipping or, at least, slip mats should be in place.

Last minute changes to polling stations

6.32 There may be circumstances (e.g. flooding, fire, vandalism) when a change of polling station may be required at short notice. As part of their planning for the election, the Local Returning Officer should have compiled a list of stand-by polling stations or Portakabins that could be used in such circumstances.

6.33 Local authorities, and not Local Returning Officers, are responsible for designating polling places and polling districts. Therefore, if possible and practical, Local Returning Officers should designate a new polling station within the same polling place. As the location of a polling station within a polling place is the responsibility of the Local Returning Officer, there will be no need to seek separate council approval for such a change.

³⁵ Section 122A, EPE Regulations.

6.34 However, if there is a need to change the polling place, council agreement will be required. If delegation procedures are in place, the Local Returning Officer should follow these as set out in the council's constitution and contact the person or persons who are entitled to make changes to the scheme of polling places.

6.35 Local Returning Officers should remember to amend the notice of poll to reflect any changes to their polling stations.

6.36 There are a number of mitigating measures the Local Returning Officer can take to ensure that electors who are affected are able to vote with minimum disruption. They could:

- if time allows, send out a letter to all affected electors informing them of the change to their polling station
- put up signs at the old polling place informing electors about the change in polling station and include directions to the new one
- display clear and visible signage at the new polling station (this should be the case at all polling stations)
- if possible and necessary, offer a shuttle transport service from the old polling station to the new one (the Local Returning Officer should liaise with their local authority to find out about any available means of transportation and insurance arrangements)

Issue, receipt and opening of postal votes

6.37 This is a critical area of activity in the delivery of any election. As a result, the process of issuing postal ballot packs in many areas is increasingly being outsourced, creating new risks and management challenges.

6.38 Local Returning Officers intending to conduct the issue and/or opening processes in-house may need to evaluate the previous arrangements and venues for suitability in order to be able to deliver a larger operation if necessary.

6.39 Any venue used for the opening of postal votes should be accessible to all those entitled to be present, including candidates, agents, observers and Electoral Commission representatives. It should be noted that accredited observers and representatives of the Electoral Commission may observe the entire postal voting process, including the issue of postal ballot papers.

6.40 In addition, there will need to be sufficient space to undertake the now required checks of personal identifiers and for recording received postal voting statements, in order to produce a marked postal voters list. It is possible that the requirement to check personal identifiers may lead to a number of agents and accredited observers attending, and so sufficient space should be available. If automated methods are used, sufficient power and network points should be in place to accommodate the necessary technology. There may also be a need to identify a venue that is close to the elections office, so that copies of the original absent voting application forms may be easily checked if

the quality of the scanned image does not allow the Local Returning Officer or their deputy to make a decision.

Local count and verification venues


6.41 The effectiveness of the verification and count, will rely on a suitable venue. The evaluation of the previous election should highlight any learning points as to the suitability of the venue(s) used previously, and produce a clear set of requirements for the selection of a verification and count venue.

6.42 In choosing a venue for the verification and for the count, there will need to be sufficient space for all aspects of the process. It is essential that sufficient space is made available to open the postal votes returned to the verification by Presiding Officers or from the Royal Mail sweep, and that the venue has adequate services to cope with any automated signature and date of birth validation systems needed to process the postal voting statements.

6.43 Any venue used for the verification or the count should be accessible to all those entitled to be present to observe the process, which includes accredited observers and representatives of the Electoral Commission.

6.44 Local Returning Officers may wish to consider providing a separate area for the media. While accommodating the media, it is essential that any media presence does not interfere with the effective conduct of the count.

6.45 If the count does not immediately follow verification, the Local Returning Officer must also provide a secure environment (e.g. a security room) for the storage of all the materials.

 Combination <p>Consideration needs to be given as to how to organise the verification and count. Where separate ballot boxes have been used for the different elections, Local Returning Officers will need to ensure that all ballot papers are included in the verification and count, and that no local government ballot papers have been left inside the European Parliamentary elections ballot box, and vice versa.</p>

Accessibility

6.46 Although the verification and count are not open to the public in the same way as polling stations are, access issues should still be taken into account when deciding on venues, as those entitled to attend may have disabilities or have other access needs. The following factors should be taken into consideration when choosing a count or verification venue:

- the location of the building
- lighting (especially if verifying or counting overnight)
- parking facilities
- the entrance and how accessible it is

- any internal steps or barriers to those attending
- floor coverings

Getting equipment to the polling stations and count venue

6.47 Any agency or contractor used to deliver polling booths or other election materials should be informed of the date of the election at an early stage in the planning process. Delivery schedules and comprehensive contract specifications need to be worked out with the agency or contractor in advance so that arrangements can be made to ensure that key-holders are able to be present to provide access to the premises.

Use of schools and rooms by candidates

6.48 Local education authorities in England and Wales and education authorities in Scotland are required to maintain a list of rooms in school premises that candidates are entitled to use for election meetings. Similarly, councils must maintain a list of other rooms maintained at the public expense which are available to candidates to be used for election meetings.³⁶

6.49 Candidates and their election agents are entitled to inspect the lists at all reasonable times in the period between the publication of the notice of election and the day before poll.

³⁶ Regulation 67, Schedule 8, EPE Regulations; Schedule 5, RPA 1983.

7 Staffing

The Regional Returning Officer's staff

7.1 Regional Returning Officers may appoint one or more deputies to discharge their duties.³⁷ There is no requirement to obtain Ministry of Justice approval for such appointments, but it is expected that each Regional Returning Officer will make appropriate provision for circumstances when they may be unable to act personally.

7.2 There is no statutory requirement about the qualifications required by a deputy Regional Returning Officer, nor do they have to be an officer at the Regional Returning Officer's authority. A deputy Regional Returning Officer is liable in the same way as the Regional Returning Officer for a breach of official duty.³⁸

7.3 The Regional Returning Officer is permitted to appoint such people as may be necessary to assist them in relation to their election function.³⁹ The relevant council is also required to make staff available to assist the Regional Returning Officer in undertaking such functions.⁴⁰

7.4 Any staff appointed by the Regional Returning Officer are under their direction and control, irrespective of their employment at other times.

7.5 If the Regional Returning Officer dies or becomes incapacitated, a new officer will need to be appointed by their local authority who will then become the Regional Returning Officer. Any delegations made by the previous Regional Returning Officer will have to be remade.

7.6 Officers should also regularly liaise with Regional Returning Officers according to agreed arrangements within the region.

The Local Returning Officer's staff

7.7 The Local Returning Officer is expected to make appropriate provisions for any circumstance for when they are unable to act in person. The Local Returning Officer may therefore wish to appoint deputies to discharge their duties.⁴¹

7.8 There is no statutory requirement setting out the qualifications required by a deputy Local Returning Officer. Payment received by a deputy Local Returning Officer is not pensionable as the employer is the Local Returning Officer, not the employing authority.

³⁷ Regulation 7(1), EPE Regulations.

³⁸ Regulation 25, EPE Regulations.

³⁹ Regulation 7, EPE Regulations.

⁴⁰ Section 6(7), EPE Act.

⁴¹ Rule 7 (1), EPE Rules.

7.9 The Local Returning Officer is responsible for appointing Presiding Officers, Poll Clerks, count staff and other staff to undertake the issue and receipt of postal ballot papers.

7.10 Local authority staff employed to carry out these functions are under the direction of the Local Returning Officer, regardless of their normal employment.

7.11 It is a requirement that any member of the Local Returning Officer's staff must not be employed by, or on behalf of, a candidate 'in or about the election'.⁴² Local Returning Officers should secure a written confirmation of this from anyone they are intending to appoint.

7.12 On appointment, all staff should be provided with a formal notice, with a copy of the agreement, or acceptance form, for them to sign and return to indicate their acceptance. This notice might usefully include the relevant secrecy provisions,⁴³ in addition to the confirmation referred to above.

Effective recruitment and induction of staff

7.13 An early assessment of the performance of Presiding Officers and other key staff at previous elections may lead to the decision to schedule further recruitment and specific training activity at an early stage in preparations for the election.

7.14 Additionally, this assessment should highlight the availability of staff on the date of the election. Also, having staff in reserve is crucial to ensuring sufficient cover.

7.15 It is advisable to ensure that the methods used to identify, recruit and employ staff are robust and would withstand scrutiny by an auditor.

7.16 Well trained and helpful staff are the most important resource at a polling station. Polling station staff are often recruited from council staff and retired staff members. Where appropriate, efforts should be made to employ polling station staff who can communicate in one or more appropriate languages used within a community. This can be helpful in providing assistance to electors who do not speak English. It may mean employing recruitment techniques designed to encourage applicants from a wide range of communities. Similarly, there may be disabled people who may be just as capable or better at polling duties than able-bodied people.

Working Time Directives

7.17 The European Working Time and Young Workers Directives (The Working Time Regulations 1998) have the basic aim of ensuring that workers have a measure of protection against working excessive hours. The

⁴² Rule 30, EPE Rules.

⁴³ Regulation 29, EPE Regulations.

regulations restrict the number of hours a worker works each week and requires employers to allow minimum periods of rest.

7.18 While work for the Local Returning Officer is not the same as work for the council, regard should be had to the total number of hours that staff are working so that every employer ensures that they are monitoring the health of staff over whom they have a duty of care.

7.19 The regulations allow for certain types of work to be excluded from the normal provisions on rest periods and total hours worked. In an election period, exemptions may be applicable. These may mean, for example, that compensatory rest can be provided at the end of a busy period rather than during it. It is also possible for a worker to opt out of the rules on total working time (but not the requirement for breaks), and this could be considered for council staff working over a longer period during the election.

Asylum and Immigration Act 1996



Local Returning Officers must ensure that all staff employed at the election are entitled to work in the UK in accordance with the provisions of the Immigration, Asylum and Nationality Act 2006. It is no longer sufficient to rely solely on an individual's National Insurance number as evidence that they are entitled to work in the UK.

The UK Border Agency's website contains comprehensive guidance for employers on preventing illegal working: www.ukba.homeoffice.gov.uk/sitecontent/documents/employersandsponsors/preventingillegalworking/

National Insurance

7.20 The Social Security (Categorisation of Earners) Regulations 1978 (SI 1978/1689) provide that there is no liability for National Insurance contributions for employment as or by the Returning Officer. Therefore National Insurance should not be deducted.

Income tax

7.21 Income tax must be deducted at the basic rate of tax except where employees are able to complete a 'P527 Certificate of taxable income'. In such cases, fees can be paid gross. In addition, employees may wish to have income tax deducted from their fees at the higher rate, if applicable. In order to ensure that the procedures adopted are acceptable, it is suggested that the Inspector of Taxes for the relevant council be consulted.

Staff for issue and receipt of postal ballot papers

7.22 In order to ensure the success of both the issuing and opening of postal ballots within the timescales, Local Returning Officers must ensure they have sufficient staff. If the issuing process is to be conducted in-house, additional staff may be required. In order to assess the likely staffing levels required the

Local Returning Officer should make an estimate of the turnout and calculate the number of opening sessions likely to be needed and the number of staff required at each.

7.23 The effect of the requirement to check the signatures and dates of birth on the postal voting statements will also need to be assessed and any learning from previous elections incorporated into staffing plans, as will the requirement to produce a marked list of the postal votes received back and the potential need to identify and remove cancelled postal votes. Much will depend upon how much of the process can be automated, and the length of time required to validate the authenticity of postal voting statements where potential discrepancies are identified. Clearly, undertaking such checks manually will require greater staffing resource than if all or part of the process is automated. In any case, these additional anti-fraud measures may require an increasing number of – possibly longer – opening sessions.

7.24 Additionally, the number of postal ballots being returned to polling stations (and in some cases from Royal Mail sweeps) may require additional staff (and space) for opening these. If postal votes are collected from polling stations during the day, they could be opened at a separate session prior to the verification of ballot papers, reducing the numbers to be opened then.



Combination

The decision whether to do a combined or separate issue of postal votes may have an impact on the number of staff required for the issuing (if done in-house) and opening of postal votes and Local Returning Officers should plan accordingly.

7.25 The Local Returning Officer must provide all staff involved in the issue and receipt of postal ballot papers with a copy of the secrecy provisions in Regulation 29(4) and (7) of the European Parliamentary Election Regulations.

Appointment of Presiding Officers and Poll Clerks

7.26 The Local Returning Officer must appoint a Presiding Officer to attend each polling station, plus as many Poll Clerks as are necessary for the election. Numbers will depend on how busy the Local Returning Officer considers the polling station will be, based on previous experience. Local Returning Officers should also take into account the number of applications for postal votes when allocating staff, as, in an area with a large number of postal voters, fewer electors will be attending the polling station to vote in person.

7.27 For guidance purposes, the recommended ratios for staffing arrangements at the last UK Parliamentary general election were as follows:

- In addition to a Presiding Officer, there should be one Poll Clerk for 1,000 voters or less.

- One additional Poll Clerk may be appointed for the next 750 electors. A third Poll Clerk may be appointed to a polling station with up to a maximum of 2,500 electors.
- Wherever possible, a polling station should not have more than 2,500 electors allocated to it.

7.28 Presiding Officers and Poll Clerks should be issued with the notice of requirement as to secrecy at the polling station, Regulation 29(1), (6) and (7) of the European Parliamentary Elections Regulations.

7.29 For any polling staff who will not be able to vote at their own polling station because of their employment, the rules allow for the Local Returning Officer to authorise them to vote at any polling station within the constituency in which they are registered, by means of a certificate of employment.

7.30 Alternatively, polling staff may choose to apply for a postal vote, and many Local Returning Officers provide an application form with the preliminary letter to potential polling staff, with information as to the deadline for applications.

Count staff

7.31 The number of counting assistants appointed will depend on the venue chosen and the number of votes to be counted.

7.32 Count staff must be provided with a copy of Regulation 29(2) and (7) of the European Parliamentary Elections Regulations, explaining the requirement as to secrecy at the count.

Training

7.33 The training of all election staff is an important ongoing function in the successful delivery of an election, and should be an integral part of the planning process. Presiding Officers and Poll Clerks are the frontline staff with who voters come into contact; in many cases, they are the only members of the Local Returning Officer's staff who the voters will meet in person. It is important, therefore, that staff are trained as fully as possible to perform their duties. Poll Clerks and Presiding Officers should receive training which includes information and a briefing on access issues and procedures. Polling station inspectors, too, may benefit from this type of training.

7.34 Staff dealing with the issue and receipt of postal votes should also receive dedicated training that includes a briefing on procedures. In addition, in England and Wales, the Forensic Science Service provides signature checking training services and the Local Returning Officer may want to consider offering this training to those members of staff directly involved in the verification of postal vote identifiers. In Scotland, Local Returning Officers should contact the Scottish Police Services Authority Forensic Services.



For further information on the services provided by the Forensic Science Service and their contact details, visit their website at www.forensic.gov.uk

For more information on the Scottish Police Services Authority Forensic Services visit www.spsa-forensics.police.uk

7.35 It is important that the Local Returning Officer and their staff formulate a training plan for all election staff who will need training for the election. Initial planning should identify who will need training and their training needs.



In order to support Local Returning Officers in providing training for election staff, the Commission is developing a range of support materials both for training and reference purposes in the delivery of key election processes. The materials below will be available to download from the Commission's website at www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/european-parliamentary-elections

- material to support the training of polling station staff:
 - *Handbook for polling station staff* (printed copies will also be available to order)
 - a quick guide for polling station staff (printed copies will also be available to order)
 - a PowerPoint presentation template
 - template lesson plans
- material to support the counting of votes:
 - guidance on doubtful ballot papers (printed copies will also be available to order)
- a frequently asked questions template for other staff involved in the electoral process (e.g. call centre staff)

Note: For those areas in England with combined European Parliamentary and local government elections, the Commission will adapt or provide separate versions of the support products listed above.

7.36 The best way to maximise the use of the training materials and services provided for the election is to ensure that key electoral staff are made aware of them and that the election team is fully conversant with them and capable of cascading the training.

7.37 Many councils have access to training personnel who could assist with this process, e.g. providing more generic training on presentation skills, to enable key election staff to cascade training to polling and other staff more confidently.

7.38 Any training plan should also include methods of evaluating the training sessions and materials, in order to inform future planning.

Training on access issues for polling station staff

7.39 Some councils provide disability awareness training to all polling staff. This could be provided by the council's access officer or by local groups of disabled people who have the necessary expertise. However, as a minimum, all polling staff should be:

- trained in the use of tactile templates, which enable blind or partially sighted electors to vote without assistance
- made aware of the large-print ballot paper to be displayed in the polling station, the hand-held enlarged copy of the ballot paper which will be available for issue to voters, and any translations of official notices into alternative formats that the Local Returning Officer has deemed appropriate and will be providing to polling stations
- made aware of the importance of the layout of the polling station, including how to place notices, taking into account lighting levels, and how to offer assistance to disabled people
- made aware of the provisions which allow disabled people to have a companion to assist them to vote or to require the Presiding Officer to assist them
- made aware of the importance of speaking clearly to people who have a learning disability or hearing difficulties
- given advice on how to assist voters with learning disabilities
- provided with guidance notes on access issues to refer to on polling day
- provided with a checklist for issues to consider when setting up a polling station
- if appropriate, shown how to install any temporary ramps safely

7.40 It is worth remembering that a number of people will be unfamiliar with the voting process and poll staff should be trained to make the voting experience as clear and accessible as possible to all voters.

7.41 As part of the Returning Officer's election review process, Presiding Officers, Poll Clerks and count staff should be asked to complete a questionnaire to highlight any unforeseen access problems or other issues which occur on polling day, so that efforts can be made to prevent these happening again at future elections.

8 Electoral integrity

Secrecy provisions

8.1 Secret voting has been a feature of elections in the UK since 1872. The concept of a secret ballot is enshrined in the First Protocol to the European Convention on Human Rights, now part of UK law through the Human Rights Act 1998. At a practical level, the legislation makes it clear that:

- the poll shall be taken by ballot
- the official mark shall be kept secret and the same official mark shall not be used again at elections for the same local counting area for five years⁴⁴
- in any legal proceedings relating to the election, no person shall be required to state for whom they voted
- the voter shall secretly mark their ballot paper and fold it so as to conceal the vote (the requirement for folding applies only to those voting at polling stations and not to those voting by post)

8.2 Regulation 29 of the European Parliamentary Elections Regulations makes provision regarding secrecy of voting and to that end requires that the various persons concerned with the conduct of the election shall not communicate:

- the names of persons who have or have not voted
- the elector numbers of voters
- the official mark
- the candidate for whom a voter has voted
- the number or other unique identifying mark on the reverse of a ballot paper

8.3 All persons attending a polling station (other than for the purpose of voting or persons under the age of 18 years accompanying a voter), staff involved in the issue of postal votes, and all persons attending the opening of postal votes and the count, must be provided with a copy of the relevant parts of the secrecy provisions as set out in Regulation 29 of the European Parliamentary Elections Regulations. This can conveniently be done by printing the relevant details on admission documentation issued to candidates, election agents, polling agents and counting agents. In the case of Presiding Officers, Poll Clerks, counting staff and staff involved in the issue and receipt of postal votes, this could be incorporated into their appointment notification.

8.4 Contravention of the secrecy requirements is an offence, and on summary conviction, an individual found to be in breach is liable to a fine not exceeding £5,000, or imprisonment for a term not exceeding six months.⁴⁵

⁴⁴ Rule 24 (2), EPE Rules.

⁴⁵ Regulation 29(7), EPE Regulations.

Key electoral offences

8.5 There are a number of electoral offences specified in the RPA 1983 and the key offences are listed below. For a full list, please refer to the appropriate legislation.

8.6 **Undue influence:** where an individual, directly or indirectly, makes use of or threatens to make use of force, violence or restraint; or inflicts or threatens to inflict injury, damage or harm in order to induce or compel any voter to vote or refrain from voting.⁴⁶ This offence includes intention and not just where an act has taken place. A person may be guilty of undue influence if they impede or prevent, or intend to impede or prevent, the free exercise of the franchise of an elector.

8.7 **Bribery:** where any individual, directly or indirectly, gives any money or procures any office to or for any voter, in order to induce any voter to vote or not to vote for a particular candidate, or to vote or refrain from voting.⁴⁷

8.8 **Treating:** where either before, during or after an election, any person, directly or indirectly, gives or provides (or pays wholly or in part the expense of giving or providing) any food, drink, entertainment or provision in order to influence corruptly any voter to vote or refrain from voting.⁴⁸

8.9 **Personation:** where any individual votes as someone else (whether that other person is living or dead or is a fictitious person), either by post or in person at a polling station as an elector or as a proxy. Further, the individual voting can be deemed guilty of personation if they vote on behalf of a person they have reasonable grounds for supposing is dead or fictitious, or where they have reasonable grounds for supposing the proxy appointment is no longer in force.⁴⁹

8.10 **Postal and proxy voting:** where an individual applies for a postal or proxy vote as some other person, otherwise makes a false statement in connection with an application for a postal or proxy vote, induces an Electoral Registration Officer or a Returning Officer to send a postal vote or associated communication to an address which has not been agreed by the person entitled to vote, or causes a postal or proxy voting communication not to be delivered to the intended recipient.⁵⁰

8.11 **False information in nomination papers:** where a person knowingly gives false information in a nomination paper or in their consent to nomination, they are guilty of a corrupt practice.⁵¹

8.12 **Offences in connection with candidature:** where a candidate is a relevant citizen of a European Union member state and makes a false

⁴⁶ Regulation 79, EPE Regulations.

⁴⁷ Regulation 77, EPE Regulations.

⁴⁸ Regulation 78, EPE Regulations.

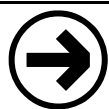
⁴⁹ Regulation 23, EPE Regulations.

⁵⁰ Regulation 24, EPE Regulations.

⁵¹ Regulation 27, EPE Regulations.

statement in the declaration required to be signed under Rule 9(2) of the European Elections Rules, that person is guilty of an offence.⁵²

8.13 It is also an offence to aid or abet the commission of the above offences.



Information regarding these offences has also been included in the Commission's *Guidance for candidates and agents* and its guidance to police forces. Copies of these will be available for download from the Commission's website at www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/integrity-guidance/electoral-events and www.electoralcommission.org.uk/guidance/resources-for-electoral-administrators/european-parliamentary-elections

Non-electoral offences

8.14 In addition to contravention of the secrecy requirements and the offences outlined above, there are a number of non-electoral offences that may also be relevant in an election context.

In England and Wales, such examples include:

- making a false statement (Perjury Act 1911)
- forgery and using a false instrument (Forgery and Counterfeiting Act 1981)
- harassment (Protection from Harassment Act 1997)
- public order offences (Public Order Act 1986)



A false statement is a false oath in Scotland under Section 44 of the Criminal Law (Consolidation)(Scotland) Act 1995. Forgery is known as 'uttering as genuine a false document' under Scots common law. Harassment is not a criminal offence in Scotland, but a person could be charged with breach of the peace (under common law) or a civil action could be taken. Vandalism is an offence under the 1995 Act.

Dealing with allegations of offences at the election

8.15 Although Returning Officers and their staff are uniquely placed to identify malpractice, they have no power to check or investigate allegations of electoral fraud or malpractice. These can be referred by the Returning Officer to the Electoral Registration Officer who can carry out certain checks. Checks are used here to mean comparing a document with other records or asking for more information where appropriate. However, Electoral Registration Officers should not carry out any investigations – that is, visit premises or interview people.⁵³ It may be that other council services have staff who are required to investigate in this sense and there may be mutual benefit in liaising with them before referring a suspicious document to the police.

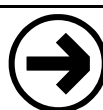
⁵² Regulation 28, EPE Regulations.

⁵³ This does not affect the Electoral Registration Officer's duty to maintain the register by taking usual steps, such as house-to-house enquiries and asking for more information.

8.16 In England and Wales, the police should be alerted to Section 181 of the RPA 1983, which places a duty on the Director of Public Prosecutions (who is head of the Crown Prosecution Service) to undertake investigations into allegations of electoral fraud or malpractice. The Crown Prosecution Service urges the police to discuss allegations of electoral malpractice with their Special Crime Division in York or London at an early stage.



In Scotland, the police will carry out the necessary investigations into the alleged offence with a view to submitting a report for consideration by the Procurator Fiscal. The Procurator Fiscal will consider the evidence and all of the circumstances of the case in order to reach a decision as to whether criminal proceedings are appropriate. Where possible, the police will keep the relevant Returning Officer informed of progress.



If Regional or Local Returning Officers need additional information or advice on the handling and referral of electoral allegations or are having difficulties in making contact with their police SPOC, they can contact:

Richard Jordan
The Electoral Commission
Senior Adviser – Electoral Integrity
Tel: 020 7271 0562
Email: rjordan@electoralcommission.org.uk

Security

8.17 It is recommended that Local Returning Officers review previous arrangements in respect of security issues with the local police in order to enable proper consideration of risk management options. This will provide a firm basis for clear communication lines should any incidents occur during the election period. This will normally include making specific arrangements for police officers to attend at polling stations, or to call in during polling day, and discussing any security issues relating to the count. Polling station staff should be given contact numbers for use in the event of problems, which should include a point of contact with the police.

8.18 As in previous years, the Commission recommends early contact with relevant police contacts. In addition to existing contacts, Regional and Local Returning Officers should make sure that they have the details of each force's SPOC for electoral matters. Regional Single Point of Contacts (SPOC) will be introduced for the 2009 elections to provide closer links with Regional Returning Officers. The Commission recommends arranging early meetings with their police contacts, at least by January or February ahead of the June election, to agree how guidance on fraud prevention will be applied locally and then, again, for a more up to date briefing once nominations have closed.

Election observers

8.19 The Electoral Administration Act 2006 amended the Political Parties, Elections and Referendums Act 2000 to allow for the observation of electoral proceedings by representatives of the Electoral Commission and by observers accredited by the Commission.

8.20 Representatives of the Commission are entitled to observe the working practices of the Electoral Registration Officer and the Regional and Local Returning Officer, as well as the proceedings at the issue and receipt of postal ballot papers, the poll and the counting of the votes. Other individuals or organisations may apply to the Commission to be accredited to observe the proceedings at the issue and receipt of postal ballot papers, the poll and the counting of the votes. All observers are required to adhere to the Commission's Code of Practice for observers.⁵⁴

8.21 Commission representatives can ask questions of electors, registration and election staff, including at the polling station and count, and also of candidates and agents, but will not do so if this would obstruct or disturb the conduct of electoral proceedings or working practices.


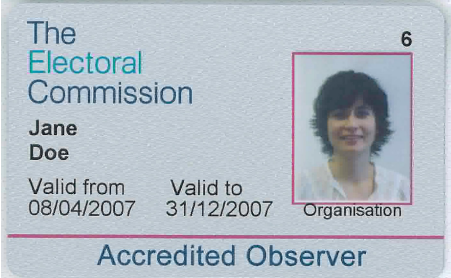
8.22 Electoral observation is a legitimate and valuable part of the electoral process, and care should be taken not to hinder or obstruct the conduct of the observation. Although Electoral Registration Officers and Regional or Local Returning Officers are entitled to limit the number of observers who may be present at any proceedings, the Commission advises that caution should be used in the exercise of this power. It is important to note that no officer is entitled to bar all observers from the entire process, only to limit the number of observers present at any one time. Careful consideration therefore needs to be given to the locations used for the various electoral processes, and to ensuring that sufficient space is made available for observers.

8.23 In all instances, the respective officers should only seek to limit the number of observers if their presence is hindering the conduct of the proceedings or jeopardising the secrecy of the ballot.

8.24 Every observer will have been supplied with an observer badge produced by the Commission, which they must wear when attending proceedings. The observer badge types are illustrated in Table 1.

⁵⁴ The Electoral Commission, *Observers at United Kingdom elections: consultation paper* (August 2006), www.electoralcommission.org.uk/__data/assets/electoral_commission_pdf_file/0004/13927/ObserversBooklet-Final_24020-17831__E__S__W__.pdf

Table 1: Observer badge types

Observer badge type	Who are they?	Access
	<p>Electoral Commission representative (pink badge)</p>	<p>Extended powers of access</p>
	<p>Observer registered with the Commission (silver badge)</p>	<p>Same as candidates and agents, plus access to the issue of postal votes</p>

9 Publicity and the media

Duty to encourage electoral participation

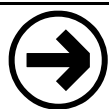
9.1 Section 69 of the Electoral Administration Act 2006 (EAA) introduces a new duty on Electoral Registration Officers and Returning Officers to take such steps as they think appropriate to encourage participation of electors in the electoral process. The Secretary of State has a power to reimburse any such promotional activities, but such reimbursement is at their discretion. This reimbursement will be from the participation fund and will not be covered by the European Parliamentary Elections Fees, or provided through the Local Government GAE settlement in Scotland and Charges Order.

Planning communication activities

9.2 Having a coherent communications strategy as part of the planning process is essential, and it should include internal as well as external communications. Good communications between electoral staff at all levels and between Local and Regional Returning Officers and their staff are a prerequisite for a successful and well coordinated poll. Communicating with other council staff with expertise in working with the media or specific groups such as young people or disabled people is also valuable, although this is beyond the scope of this section, which addresses external communication activities.

9.3 Any election attracts considerable interest and involves many different kinds of communication activities – from statutory notices and distribution of poll cards, to provision of information and dealing with public enquiries. In addition, there is a need to manage media relations. This will particularly affect those authorities in England that are also holding local government elections.

9.4 Electoral Registration Officers and Returning Officers should ensure that they are aware of any possible political sensitivity around work they initiate.



Publicity and voter education can be costly if not planned with care and delivered in a cost effective manner. To assist Local Returning Officers, the Commission has developed an online electoral participation toolkit, the 'Do Politics Centre'. It contains practical materials, advice and guidance for practitioners aiming to increase voter awareness. All materials are free to access and include case studies, event plans, campaign techniques and templates for communication materials and can be accessed at www.dopolitics.co.uk

9.5 Participation sub-groups have been set up in each of the electoral regions, which will see the Electoral Commission, Regional and Local Returning Officers, Electoral Registration Officers and their staff, working together on issues around communication and promotion of participation. Further information about the campaign and materials and resources to

support Local Returning Officers will be issued by the Commission via alert or circular.



Electoral Registration Officers and Regional or Local Returning Officers may wish to consider the feasibility of undertaking joint awareness-raising campaigns with colleagues from within their region. Such an approach may lead to a more effective use of limited resources, and will also assist in the delivery of a consistent message across the electoral region.

Statutory and other notices

9.6 Any notices the Regional or Local Returning Officer must publish, should be displayed in some conspicuous place or places in the electoral region or local counting area, respectively.⁵⁵ Regional and Local Returning Officers should decide well in advance how they intend to publish notices throughout their areas. Notice can also be given 'in such other manner' as is deemed desirable.

9.7 It is advisable to review all locations previously used for statutory and other election notices in order to ensure that they are placed in sufficiently accessible locations for the public. In addition to more traditional locations, a helpful place to post the official notices is on the council's website. Considering the requirement to make reasonable adjustments in service delivery for disabled electors, the internet is now a vital tool which can help to make information accessible to most users.

9.8 The Commission therefore recommends that any notice which must be posted should also be put on the council website as soon as possible after the physical notice has been given. We would also recommend that during the election period the council has a link from its front page to the election information section.

9.9 As soon as nominations are closed or, if there are any objections, as soon as they are disposed of, the Regional Returning Officer has to publish a statement known as 'the statement of parties and individual candidates nominated'.⁵⁶ The Regional Returning Officer has to send at least one copy of it to each Local Returning Officer, and each Local Returning Officer must publish the notice at a place within their area.⁵⁷ The Regional Returning Officer must also send a copy of this statement to the Electoral Commission.⁵⁸

9.10 The statement of parties and individual candidates nominated must also include a notice of poll if the election is contested.⁵⁹

⁵⁵ Regulation 123, EPE Regulations.

⁵⁶ Rule 15, EPE Rules.

⁵⁷ Rule 17, EPE Rules.

⁵⁸ Rule 15(8), EPE Rules.

⁵⁹ Rule 27, EPE Rules.

9.11 The Local Returning Officer must publish a notice of the situation of each polling station and the description of voters entitled to vote there. As soon as this notice is published, the Local Returning Officer must give a copy of it to each of the election agents.⁶⁰

Managing public enquiries

9.12 The days leading up to the election and polling day itself are notable for the considerable volume of enquiries from voters, both in person and by telephone. Setting up a dedicated team (or providing training to front-line staff) to deal with the likely high number of enquiries received within a relatively short timescale can bring real benefits to both the public and the elections staff.

9.13 Such provision needs to be planned carefully and, if delivered effectively, will ensure that voter enquiries are dealt with promptly and can be escalated to more experienced staff when necessary, while taking the pressure of routine enquiries away from the elections office.

9.14 The Commission will be producing a frequently asked questions template for staff involved in dealing with enquiries from electors, such as persons staffing any election helpline set up by the local authority, which will be available to download from the Commission's website.

Specific voter awareness issues

Changes to polling places and stations

9.15 In addition to the statutory notice, it is advisable to inform electors clearly of any changes to polling station locations. This can be done by including additional information with the poll card, such as a simple map and bold text informing of a change of venue, drawing electors' attention to the new arrangements. The statutory wording for the poll cards must, however, still remain.

Information on electoral system and how to vote

9.16 Voters will be electing their representatives by a form of closed list proportional representation, using the d'Hondt formula for the distribution of seats.

9.17 In order to be able to cast a valid and effective vote, electors need to be made aware of how voting at a European Parliamentary election works and how their votes are translated into seats.



Combination

Local Returning Officers with combined elections in England should give consideration to how information about the different electoral systems can be communicated to electors.

⁶⁰ Rule 27, EPE Rules.

Access issues

9.18 Any facilities or provisions for disabled voters, those with low levels of literacy and for those who do not have English as their first language need to be publicised if people are to know that they are available. Any such publicity will also need to be in a format that is accessible to its intended audience.



The Electoral Commission has published independent research into the range of activities undertaken by UK local councils to promote electoral issues. This report, *Making an impact*, recommends that good promotional materials should aim to achieve the following:⁶¹

- be clear at who they are aimed
- use language that is appropriate for the audience
- be produced in a format that is accessible to the audience
- convey a clear message
- be attractive or eye-catching
- encourage action on the part of the audience

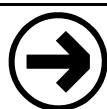
9.19 It is important to remember that different localities and communities retain distinct characteristics, which means that the same promotional activities or materials can work well in some areas and with some groups and not so well in or with others.

9.20 The following are examples of how to provide useful and practical information on access:

General information	<ul style="list-style-type: none">• Information about electoral registration and elections and the facilities available to assist disabled people could be provided on the council's website.• An elections helpline could be provided, with a dedicated number and an email address.• Leaflets, posters and articles for newspapers can be distributed to a variety of organisations working with specific groups of the community, so that they can effectively disseminate information through their networks – for example, Age Concern, Talking Newspapers and groups for people from minority ethnic communities.• Publicity and advertising strategies should take account of the range of local communities. Publicity through the spoken word has been found to be the most effective strategy, with local radio and local television popular options. Particularly with the advent of digital and cable
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⁶¹ The Electoral Commission, *Making an impact* (2002), www.electoralcommission.org.uk

	<p>broadcasting, there may be minority language radio or TV stations in areas with large minority ethnic communities.</p> <ul style="list-style-type: none"> Articles in local newspapers, including free and community newspapers, and translated advertisements in the minority ethnic press are all useful.
Absent voting	<ul style="list-style-type: none"> Information could be given on other methods of voting, i.e. postal and proxy voting, for people who may prefer to vote in this way. A simple, plain English guide on completion of postal votes could be produced, which could contain symbols to explain how to complete and collate the necessary paperwork.
Polling stations	<ul style="list-style-type: none"> A leaflet on what to expect at polling stations, including pictorial information, could be published specifically for disabled people.



The Commission has produced easy-read guides for England, Scotland and Wales which can be ordered from our distributor:

Tel: 0845 8500 501

Fax: 020 8867 3225

Email: ecpublications@ecgroup.co.uk

The leaflet is also available for download from the Commission's Do Politics Centre at www.dopolitics.org.uk

9.21 Direct contact should be made with community groups, including those for older people and disabled people. There may be an existing network of publicity and help within the communities that could be built upon.

9.22 Local Returning Officers should be aware of the different communities and languages in their area and target resources and information appropriately.

Postal and proxy voting

9.23 Although many people, including disabled people, prefer to vote in person, others find it more convenient to vote by post or to appoint a proxy to vote on their behalf. This being the case, there should be adequate publicity surrounding postal and proxy voting so that people are aware of these provisions and know how to apply. Based on local knowledge, application forms should be left in a variety of places where people have easy access to them. Absent voting forms can be produced in a variety of formats in order to make it easier for people to apply.

9.24 The Commission produces postal voting application forms and the leaflets containing the forms have been produced in a number of languages

and formats, including audio tape, Braille and large print, and are available free of charge. All foreign language leaflets are bilingual. Postal voting leaflets and application forms are available to order in hard copy or are downloadable from the Commission's website.

9.25 In addition to the ballot papers, postal voting statement and envelopes, Local Returning Officers may include such information as they think appropriate about how to obtain directions and guidance in alternative formats in postal ballot packs. Providing information in a pictorial format is particularly useful for all voters, including those with low levels of literacy.

Managing media relations

9.26 Prior to any election, Electoral Registration Officers, Regional and Local Returning Officers, and electoral administrators should decide how their media relations are to be handled and should put the necessary arrangements in place. Returning Officers should clarify in advance who within their staff is authorised to speak to the press and broadcasting media and should ensure that all staff are aware of this information. Risk management issues can be addressed through rigorous procedures for the accurate and appropriate release of information relating to the election.

9.27 It is also important that the media know who they should contact for information and are accurately directed to that contact by council staff. Local Returning Officers may wish to consider using the council press office as the election press office for the duration of the election. This means that the media are dealt with by media-trained people and allows administrators to get on with administering the election, and also ensures consistency of message on behalf of the Local Returning Officer to all press enquiries received.

9.28 The media can assist in the administration of the election in many ways, for example by promoting awareness of the election and seeking to engage the electorate. The media can be extremely helpful in getting a message out to voters in the event of any incident requiring new or revised arrangements to be communicated, or to inform specific community groups of arrangements that may benefit them, for example accessibility information. Advance planning of any media strategy is important in order to identify all of the key dates in the election administration process that could be used to highlight the election itself.

9.29 Local Returning Officers will find it helpful to have current contact details of all the relevant media in their area.

Briefing packs

9.30 Providing the media with a briefing pack, which gives useful information and contacts, will save time for Returning Officers and their staff in the long term. It also aids the media in doing their job. It is suggested that any briefing pack include the following:

- the election timetable
- election press office contact details
- media access arrangements for the verification and the count
- previous relevant election results
- details of registered political parties and their list of candidates, and of individual candidates and their agents

9.31 Press briefing packs should be prepared well in advance so that they can be made available at the beginning of the electoral process. The Commission will be producing an online handbook for the media ahead of the European Parliamentary and English local government elections, which explains the Commission's role in the elections and answers questions frequently asked by the media about the conduct of elections and campaign spending rules and reporting requirements. The handbook will be available to download from the Commission's website at www.electoralcommission.org.uk in spring 2009.

Polling stations

9.32 The media have no rights to enter a polling station except as voters. They must not be allowed to film or interview voters in the polling station. If a film crew has been given permission by the Local Returning Officer to film outside the polling station but within the polling place, Presiding Officers must be instructed to make sure that the film crew does not hinder or harass voters on their way to vote, or obstruct the entrance to the polling station.

9.33 To avoid having to turn down requests for access to polling stations on polling day, it may prove helpful if Local Returning Officers consider making a polling station available to the media prior to the opening of polls, generally the day before polling day. This allows TV crews and photographers to get their footage prior to polling day, and this may often be run on the eve of the poll.

Verification and count

9.34 Where interest is expressed by radio and/or television in broadcasting from the verification and/or count venues, it is good practice to meet at an early stage with media representatives to discuss the Local Returning Officer's intentions as to how the verification and count will proceed and also to ascertain the media's likely requirements.



Combination

There might be particular media interest in those areas holding combined elections and Local Returning Officers may want to meet with media representatives to go through how they will manage the different counts. Broadcasters in particular will be interested in the timing of the count and when they can expect to broadcast any results.

9.35 The following should be considered when planning media facilities at the verification and/or count venue:

- Contact principal broadcast organisations well in advance.
- Outline the press facilities available. Remember it is the Local Returning Officer and not the media who have the final say as to what is allowable at the count venue.
- Media representatives may well wish to check the venue in advance, particularly if they intend to carry out filming on the night.
- Provide an opportunity for media representatives to inspect the venue to identify space for interview purposes and also for parking vehicles, and to identify cable routes, assess power supplies and highlight communication requirements (such as telephone or ISDN lines).
- Make arrangements for indicating completion of the verification and count, and declaration procedures.
- Arrange for sound systems to be used for the announcement and live feed.
- Make accreditation arrangements for journalists, technicians and photographers attending.
- Designate an area of the venue for media use.
- Provide media passes.
- Make those attending aware of the secrecy provisions.
- Ensure that there is a nominated media spokesperson in place for the count, and that everyone is aware of who this is and that all questions should be directed to that person.
- Make sure that the media are aware of any restricted areas and procedures – for example, ensure that camera operators are aware that they must not overview sensitive information (such as close-ups of ballot papers) or obstruct verification/count staff.
- Refer any relevant questions to the Regional Returning Officer.

9.36 Any briefing pack prepared for the media should give details of what facilities will be made available for them, and should also include information on the election, the area, and the candidates (including photographs if available) and plain English information on the verification and count process itself.

9.37 The Local Returning Officer may also wish to indicate in the briefing pack the likely timetable of events on the day, with an estimate of the possible completion times. It is advisable that Local Returning Officers take a few moments during the local count to discuss with producers and reporters how they will indicate when an announcement is to be made. This will allow news desks to be informed, so that live feeds can be set up at short notice if desired.

10 Resources

Key contacts

Name/organisation	Contact details
British Printing Industries Federation Farringdon Point 29–35 Farringdon Road London EC1M 3JF	www.britishprint.com
Bob Toal Public Affairs Officer	Email: bob.toal@bpif.org.uk Tel: 020 7915 8319
Capability Scotland Head Office Westerlea 11 Ellersly Road Edinburgh EH12 6HY	www.capability-scotland.org.uk Tel: 0131 313 5510
Equality and Human Rights Commission 3 More London Riverside Tooley Street London SE1 2RG	www.equalityhumanrights.com Tel: 020 3117 0235
Election Petitions Office Petitions Office Queen’s Bench Master’s Secretary’s Department Room EO8 Royal Courts of Justice The Strand London WC2A 2LL	Tel: 020 7947 7529
Ministry of Justice Selborne House 54 Victoria Street London SW1E 6QW	www.justice.gov.uk Tel: 020 7210 8500
RNIB (Royal National Institute of Blind People) 105 Judd Street London WC1H 9NE	www.rnib.org.uk Email: helpline@rnib.org.uk Tel: 020 7388 1266
RNID (Royal National Institute for Deaf People) 19–23 Featherstone Street London EC1Y 8SL	www.rnid.org.uk Email: informationline@rnid.org.uk Tel: 020 7296 8000

Royal Mail**www.royalmail.com****Scope**6 Market Road
London N7 9PW**www.scope.org.uk**Email: response@scope.org.uk
Tel: 020 7619 7100**The Scotland Office**1 Melville Crescent
Edinburgh EH3 7HW**www.scotlandoffice.gov.uk**

Tel: 0131 244 9005

Scottish Courts**www.scotcourts.gov.uk****Welsh Language Board**Market Chambers
5-7 St Mary Street
Cardiff CF10 1AT**www.welsh-language-board.org.uk**Email: post@bwrdd-yr-iaith.org.uk
Tel: 029 2087 8000
