

# Part B – Planning and organisation

Referendum on the UK's membership  
of the European Union: guidance for  
Counting Officers

Published January 2016 (last updated May 2016)

This guidance uses 'must' when referring to a specific legal requirement; 'should' is used for items considered to be recommended practice, but which are not legal requirements.

## Translations and other formats

All of our guidance and resources for this poll are also available in Welsh.

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# Updates to this document

<b>Updated</b>	<b>Description of change</b>	<b>Paragraph number</b>
May 2016	Updated to reflect the final legislation (including confirmation of the date of the poll), the confirmed Chief Counting Officer directions, recent EA Bulletins, and to include legislative references	

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# 1 Planning for the referendum

1.1 To plan effectively for the referendum, you should prepare a project plan, treat it as a 'living document', keep it under regular review, and use it to monitor progress.

1.2 You should ensure that your planning supports the delivery of the following outcomes:

- voters are able to vote easily and know that their vote will be counted in the way they intended
- it is easy for people who want to campaign at the referendum to find out how to get involved, what the rules are, and what they have to do to comply with these rules, and they can have confidence in the management of the process and the result

1.3 Liaison between the RCO and COs in the electoral region should start at an early stage to support the delivery of a well-run referendum across the whole of the electoral region and, ultimately, across the whole of the UK and Gibraltar.

1.4 Before starting your detailed planning, you should set out what you want to achieve and what success would look like. Your project plan should include clearly defined objectives and success measures.

1.5 The CCO has provided a [template project plan](#) that you may wish to use and adapt to fit your local circumstances. The template project plan includes some sample aims and suggested tools that will allow you to measure the extent to which the conduct of the referendum has been successful. You should also liaise with your RCO at an early stage to ascertain their objectives and success measures so that you can reflect these in your planning.

1.6 If you have not already done so, you should evaluate the planning for, and delivery of, previous elections and referendums and identify what worked well and what did not, which should inform your planning for this referendum. Your project plan for the referendum should also include a plan to evaluate procedures post-referendum and identify lessons learnt. Further guidance on reviewing electoral procedures can be found in [Part F – After the declaration of the result](#).

1.7 You should ensure that your planning reflects the particular context and circumstances of the poll. For an overview of some of the key aspects of context relevant to this referendum which should underpin all aspects of your planning, see chapter 2 of [Part A – Counting Officer role and responsibilities](#).



With the referendum taking place seven weeks after the scheduled May 2016 elections, planning for the two events will inevitably overlap, with the benefit of preparatory work for one supporting preparations for the other.

While the UK Government have not made any provision to enable the combination of the poll at the referendum with the poll at any other electoral event, there remains the potential that there could be a by-election held on the same day as the referendum. If this was the case, the polls would need to be held simultaneously, which would mean (for example) that different polling stations would be needed for each poll. The CCO therefore recommends that, wherever possible, other polls should not be held on the same day as the referendum. If you become aware of the potential for another poll to be held in your area on the same day or are facing pressure to hold any other elections on 23 June, please contact your local Commission team in the first instance.

1.8 Your project plan should cover contingency planning and business continuity arrangements. The continuity arrangements should include provisions to cover loss of staff and loss of venues during the referendum period. Guidance on developing continuity arrangements for these specific processes is provided in the relevant sections throughout this part of the guidance.

1.9 Your project plan should also identify the resources required. Now that the fees and charges for the referendum have been set, you should reconcile projected costs for activities against the available budget. Local authorities in Great Britain are required to place the services of their staff at the disposal of RCOs and COs to assist them in the discharge of their functions. You should take all necessary steps to ensure that the local authority makes the necessary resources available to you to enable you to discharge your functions.



[The Referendum on the UK's Membership of the European Union \(Counting Officers' and Regional Counting Officers' Charges\) Regulations 2016](#) set out the maximum amounts recoverable by Counting Officers and Regional Counting Officers for their services and expenses in relation to the referendum.

We have produced [Counting Officers' expenses guidance notes](#) and an [FAQ document on Fees and Charges](#) which are available on our website together with [Counting Officers' Expenses Claim Forms](#).

We have also made [The Counting Officers', Regional Counting Officers' and Chief Counting Officers' Accounts \(European Union Referendum\) Regulations 2016](#) which specifies the date by which claims must be received as 23 December 2016.

1.10 The CCO has published a [timetable](#) containing key referendum dates which can be used to assist you in your planning.

1.11 You should also prepare a risk register, treat it as a 'living document' and keep it under regular review, using it to monitor the risks and document any changes in risk, as well as ensuring that mitigating actions are identified and are being taken forward as appropriate. Your risk register should identify the following:

- Any difficulties and problems that may occur, and the actions taken to mitigate them.
- The seriousness of any risk by indicating both the likelihood of the risk occurring and the impact of the risk if it did occur.

1.12 The CCO has provided a [template risk register](#) that you may wish to use. The template provides some example risks and suggestions for mitigating those risks. In addition to the risks identified in the template you should also identify any other risks, including ones specific to your local circumstances, and how you would mitigate those.

## 2 Staffing

2.1 Your project plan should include identification of staffing requirements, including any necessary recruitment arrangements. You should identify the staff you will need at an early stage in your planning and then make the necessary appointments at the earliest opportunity.

2.2 You should seek advice from your local authority's human resources department as necessary to ensure that the methods used to identify, recruit and employ staff are robust and comply with all legal requirements.

2.3 Following an assessment of the performance of staff used at previous electoral events, you may wish to write to staff used previously at an early stage in the planning process to check their likely availability.

### Project team

2.4 You should establish a project team to support you in carrying out your functions and in delivering a well-run referendum. In addition to yourself, your project team should include:

- any appointed deputies
- other electoral services staff members
- where you are not also the Electoral Registration Officer (ERO), the ERO

2.5 Your project team should also include any other key personnel you consider appropriate.

2.6 The project team should have a clear remit and understanding of the tasks to be carried out. At the planning stage, a schedule of meetings should be prepared, and a record of each meeting should be kept as an audit trail of what was discussed and of any decisions made.

### Deputies

2.7 You should ensure that deputy arrangements are in place in case you are unable to act personally as CO. You may appoint deputies to discharge all or any of your duties. Any appointed deputies should have the skills and knowledge required to carry out the functions they have been assigned. Appointments must be made in writing and should include details of the functions that the deputy is authorised to exercise on your behalf. The acceptance should also be made in writing<sup>i</sup>.

2.8 A deputy is liable, in the same way as the CO, for a breach of official duty<sup>ii</sup>.

## Election office staff

2.9 Election office staff, with their experience of running electoral events, should be part of the project team for the referendum. You should assess whether the team is adequately staffed or whether you will need to recruit any additional staff to support the effective delivery of the referendum.

## Electoral Registration Officer

2.10 Where you are not also the Electoral Registration Officer (ERO) you will need to liaise closely with them to obtain the relevant registration and absent voting data. If there is a need for exchanging data electronically, you should agree the timings for the exchange of data and ensure that a test of the process is carried out ahead of the first scheduled transfer. There will be updates to the data at a number of points within the referendum timetable, in particular in Great Britain, where the ERO must publish two interim referendum notices of alteration as well as the final referendum notice of alteration<sup>iii</sup>.



The [rolling registration dates](#) timetable sets out the recommended window within which the second interim referendum notice of alteration should be published in Great Britain, as agreed with the EU Referendum Delivery Group. This document also sets out the application and determination deadlines for both interim notices and the final referendum notice of alteration.

## Support staff

2.11 You should identify support staff and ensure they are available to assist with any public enquiries you may receive in the run-up to the referendum. You should set up a dedicated team (or train front reception or call centre staff) to deal with a range of basic enquiries, such as questions about whether or not a person is registered to vote, postal and proxy voting and the location of polling stations.

2.12 Any staff who will be dealing with public enquiries should receive training to deal with such enquiries and be provided with responses to frequently-asked questions, as well as a list of the locations of polling stations and key dates in the referendum [timetable](#). The CCO has made available a template of [FAQs for front line staff](#) which shows the types of questions you can expect to receive in the referendum period and you can adapt to fit your local circumstances. A process should be in place for the escalation of more complex enquiries to election office staff.

2.13 The ERO should consider whether they will need any additional support staff to assist with the processing of registration and absent vote applications in the lead-up to the referendum – and in particular in the lead-up to the registration deadline on 7 June 2016 .



Further information on processing registration and absent vote applications in the lead-up to a poll can be found in [Part 4 - Maintaining the register throughout the year](#) and [Part 5 – Absent voting](#) of the Commission’s guidance for EROs in Great Britain.

## Staff for specific referendum processes

2.14 As well as establishing your project team and support staff, you will need to appoint staff to help you to undertake the various referendum processes. You should identify staffing requirements and put processes in place for recruiting the necessary staff. You should have access to a database of staff used at previous electoral events. Staff can also often be recruited from among local authority employees.

2.15 As part of your identification and recruitment of staff, you should consider the skills appropriate to each role. For example, those with experience working in finance could be recruited to record the number of unused ballot papers at the count, or to work at postal vote opening sessions to record the daily totals.

2.16 As there is no age restriction for staff working on specific referendum processes, you could liaise with local further and higher education establishments to identify young people who could be recruited to work at polling stations or at the verification and count, which could also help to boost their engagement with the democratic process.



Information on the payment of fees to staff after the referendum can be found in [Part F – After the declaration of the result](#).

## Polling station staff

2.17 You must appoint and pay a Presiding Officer and such Poll Clerks as may be necessary to staff each polling station.<sup>iv</sup> However, you may not employ a person who has been employed by or on behalf of a referendum campaigner in connection with the referendum. You should include this as a condition for employment and ask potential staff to sign a disclaimer on any job acceptance paperwork.

2.18 It is important that polling stations are set up and staffed in such a way as to ensure that voters are able to receive a consistently high-quality service.



### Direction

The CCO has directed that, as a minimum, the following ratios (which exclude postal voters) must be complied with when allocating electors and staff to polling stations:

- A polling station should not have more than 2,500 electors allocated to it
- In addition to a Presiding Officer, there should be one Poll Clerk for polling stations with up to 1,000 electors
- One additional Poll Clerk should be appointed for polling stations with up to 1,750 electors
- One further Poll Clerk should be appointed to a polling station with up to the maximum of 2,500 electors.

These ratios are recommended minimum levels: there may be circumstances in which you wish to employ a higher number of staff.

In any case where a polling station has more than 2,000 electors allocated to it, the CO must seek agreement from their RCO to their approach in that polling station, setting out how they intend to manage it so as to ensure that all electors allocated to it can vote easily and without delay.

Should any CO believe that their particular circumstances are such that they wish to adopt an approach in a particular polling station which does not meet the minimum ratios, they will be able to apply for an exception.

2.19 COs should be able to explain the reasoning behind their decisions on allocating electors and staff to polling stations. Each decision should be taken on a case-by-case basis and not for the voting area as whole.

2.20 In deciding on the allocation of electors and staff to polling stations, as a minimum you should consider:

- any particular local circumstances such as population increases and demographic trends
- levels of postal voters
- projected turnout – taking into account the potential for late engagement and interest in the referendum, by which point scope for adjusting plans will be limited. You should plan for the possibility of a high turnout, using the Scottish referendum as your basis.
- voter throughput and flow, including how the voter will move through the voting process from entering to exiting the polling station

2.21 This list is not exhaustive, and you should also consider any other factors that you consider appropriate.

2.22 Any polling station with over 2,000 electors will create particular challenges in ensuring voters can vote without delay, taking into account the hours of poll and the fact that voters will not typically vote in an even spread across the day. To be able to respond to these challenges, staff will need to

be capable of being deployed flexibly to respond to peaks in voter activity and limit the time voters are expected to queue to receive their ballot paper. One mechanism for managing larger polling stations effectively would be to split the register within that polling station to create two separate issuing desks each managed by two members of staff, thereby doubling the capacity for processing, while recognising that there would need to be sufficient space within the polling station for this to operate effectively.

2.23 COs should review their current allocations and consider whether any polling stations which currently have more than 2,000 electors (excluding postal votes) allocated to them can be managed effectively taking into account their specific circumstances or whether they would need to be split into separate polling stations. In doing so, COs should take into account lessons learnt from their experience of managing polling stations in their area at recent electoral events.

2.24 Where a polling station has more than 2,000 electors allocated to it, in seeking agreement from your RCO as to your approach in that polling station, you should set out:

- the location and size of the polling station
- the number of electors allocated to that polling station
- details of your approach to managing the polling station, including how many staff will be allocated to it and how they will be deployed
- an explanation of why that approach is proposed for a particular polling station

2.25 There are different options open to you for deploying staff within polling stations. Your plans should be sufficiently flexible to allow you to deploy staff to respond to specific issues that may arise throughout polling day. While voters in a queue at their polling station at 10pm must be issued with their ballot paper, it is still important that sufficient staff are in place to enable the delivery of a high-quality service to voters throughout polling day. You should, however, be prepared to respond if there is a queue at one or more polling stations in your area at 10pm. The CCO's [handbook for polling station staff in Great Britain](#) and Gibraltar [and handbook for polling station staff in Northern Ireland](#) outline the procedures to be followed throughout polling day and at the close of poll.

### Example

If you have 1,200 electors allocated to a polling station, you should as a minimum appoint one Presiding Officer and two Poll Clerks to that polling station, and decide what roles the staff at that polling station should carry out.

So, for example:

- all three staff could be involved in the issuing process, or
- one member of staff could act as an information officer to provide information to voters and to be available to respond to any questions

from voters, while the other two staff members carry out the issuing process.

Although you should decide on what roles the staff at each polling station should carry out, it might be necessary to adapt this at different points in the day, for example, at any particularly busy points. It is therefore essential to retain flexibility to allow you to adapt to changing circumstances throughout polling day.

If the polling station is located in a polling place which contains multiple polling stations, one or more members of staff could be used as an information officer covering all of the polling stations and to assist with directing voters to the correct polling station. Also, staff from one polling station in the polling place could potentially be used to assist staff in another polling station within that building if required, for example as a result of a high number of voters attending one of the stations at a particular time when the other station is quiet.

2.26 While appointing 'stand-by' staff may not always be practical or feasible within your budget, you should nevertheless be able to deploy staff flexibly on polling day to respond to specific issues that may arise.

2.27 You may also consider appointing part-time Poll Clerks to provide assistance at expected peak polling hours or in the run-up to 10pm. In addition, you could appoint a team of back-up polling station staff to be deployed at peak times to specific polling stations or to respond to specific issues that may arise throughout polling day or at the close of poll. If parts of the voting area are not easily accessible, it may be helpful to have teams positioned in different parts of the area.

2.28 To be able to deploy staff flexibly on polling day, staff will need to be trained appropriately. Further guidance on training can be found in **Chapter 3 - Training**.

## Polling station inspectors

2.29 Polling station inspectors play an important role in the effective management of the poll. They provide an essential communication link between you and your polling station staff including dealing with queries and problems arising at polling stations on polling day.

2.30 You should make arrangements to appoint polling station inspectors to visit and inspect polling stations on your behalf on polling day. In deciding on the allocation of polling station inspectors to polling places, you should consider:

- the geography of the area and travelling distance between polling places
- the number of polling stations in each polling place
- the experience of polling station staff at each polling station
- estimated turnout levels and any particular local circumstances

- the number of visits polling station inspectors will be expected to make to each polling station during the day

2.31 Polling station inspectors should ensure that all of their assigned polling stations are properly set up in such a way as to take account of voter needs and contribute to the smooth running of the polling station, and are fully equipped and accessible to all voters. They should also ensure that the polling station meets your expectations of service to voters.

2.32 The polling station inspector should work with the Presiding Officers and other polling station staff to identify and deal with any problems arising throughout polling day and at the close of poll, and should escalate any issues to you as appropriate.

2.33 The polling station inspector may be involved in liaising with the electoral registration office regarding polling day amendments to the register and, in Great Britain, emergency proxy applications. In these instances, you should have a process in place for communicating any changes, and should advise polling station inspectors of their role in it, if any.

2.34 For initial visits, polling station inspectors should aim to visit all of their allocated polling stations as quickly as possible in order to be able to re-assure you that all stations have opened on time and are operating effectively. These visits could be preceded, where possible, by a separate communication sent by Presiding Officers to their polling station inspectors, prior to the opening of the poll. For example, polling station inspectors could be notified via text message confirming whether the polling station is set up and ready for opening, and whether there are any issues. This should then help the polling station inspector prioritise their visits to polling stations.

2.35 Subsequent visits throughout the day can be used for a variety of purposes including collecting postal votes, answering any questions that polling station staff may have, to check that all notices remain properly displayed and to deliver any missing or additional equipment that is required. Polling station inspectors should therefore carry with them spare equipment and stationery in case of any shortages or missing items. This should include polling station handbooks and quick guides, ballot papers, equipment, stationery and other items such as forms, envelopes and copies of the register of electors.

2.36 You should provide polling station inspectors with instructions as to their role and a checklist of tasks that they should carry out. A [checklist](#) that may be given to polling station inspectors for them to complete during their polling station visits is available. This document also contains a list of what each polling station inspector should receive prior to polling day.

2.37 Beyond highlighting any issues, completed checklists can also be used to inform an evaluation of the suitability of polling stations as part of the post-referendum review process.

# Postal vote issue and opening staff

2.38 You should identify staffing requirements for your postal vote issuing and opening sessions. You should not appoint anyone who has been employed by or on behalf of a referendum campaigner in connection with the referendum. You should include this as a condition for employment and ask potential staff to sign a disclaimer on any job acceptance paperwork.

2.39 The following staff may be required:

- specially trained supervisory staff
- clerical staff
- IT staff

2.40 In devising your plans you should be mindful of the demands the issue and opening of postal votes can place on core staff and take into consideration that there will be a number of issuing sessions required throughout the referendum timetable. Those who have applied to register to vote close to the registration deadline and who have also applied to vote by post must be issued with a postal vote if their postal vote application was received by the postal vote application deadline and the registration application has been determined by the determination deadline (i.e. by 15 June 2016).

2.41 You should take into account the total number of current postal voters and projected turnout of postal voters when deciding on your staffing arrangements. For planning purposes, taking into account the potential for late engagement and interest in the referendum by which point scope for adjusting plans will be limited, you should plan for the possibility of a high turnout, using the Scottish referendum as a basis. Also, your review of previous electoral events will give you an indication of how robust your previous staffing assumptions were.

2.42 This assessment may need to be revised after you have received the final postal voters' lists from the ERO. In any event, you should build sufficient flexibility and contingency into your staffing arrangements to deal with a last-minute increase in numbers of postal voters, an unexpected increase in turnout, or varying volumes of postal votes being returned on different days. In Great Britain, your arrangements also need to be such that you can ensure you can effectively manage those delivered to polling stations on polling day.

2.43 Even if you decide to outsource all or part of the postal vote issuing process you should designate a member of the project team to monitor outsourced work and the work of the contractor, and specifically to attend those parts of the issuing process that have been contracted out. This person should monitor the work of the contractor, which should include carrying out tasks such as spot checks to ensure that the postal voting stationery does not contain any errors, the postal ballot packs are being correctly collated and that any postal votes that need to go overseas are being prioritised. Further

guidance on managing contractors and suppliers can be found in **Chapter 5**, below.

2.44 How the verification of personal identifiers is to be carried out, including how much of this process is automated and how much of it needs to be done manually, will impact on the numbers of staff you will require for opening returned postal votes. You must have arrangements in place to enable the checking of 100% of postal vote identifiers.



Further guidance on the postal vote issue and opening processes are provided in [Part D – Absent voting](#).

## Verification and count staff

2.45 In order to ensure that voters can have confidence that their votes will be counted in the way they intended, you will need to put in place appropriate resources to ensure that the verification and count are timely and that the processes are designed and managed in such a way as to secure accurate local totals with a clear audit trail.

2.46 You should identify the number and type of staff you will require to run your verification and count in accordance with the legislation and CCO's directions, and make the necessary appointments as soon as possible. You should not appoint anyone who has been employed by or on behalf of a referendum campaigner in connection with the referendum. You should include this as a condition for employment and ask potential staff to sign a disclaimer on any job acceptance paperwork.



Guidance on the verification and count process is contained [in Part E – Verifying and counting the votes](#).

For practical guidance on the verification and count process, see the verification and count resource '[Planning for an effective verification and count: a toolkit for Counting Officers](#)'.

2.47 There will also be an expectation among campaigners and the media for local totals and the overall result to be declared as soon as possible and this too will need to be kept in mind in determining staffing requirements.

2.48 Wherever possible, you should not use staff who have been on polling duty all day.

## 3 Training

3.1 The CCO and RCO will hold briefings for you and your core staff, and you should ensure that you and your staff attend all relevant sessions.

3.2 It is vital that each member of the team, whether permanent or temporary, understands their particular role and any statutory obligations associated with the work they are undertaking. All staff should receive training on the legislative requirements and responsibilities relevant to their role, as well as training on ensuring equal access and good customer care.

3.3 Your project plan should contain a plan for training which identifies the training needs of both permanent and temporary staff. You should also develop methods of evaluating the training sessions and materials in order to inform future planning. If you have training personnel within your local authority they may be able to assist you with this process.

3.4 While training activities for temporary staff may not take place until shortly before the referendum, planning for those activities should start at the earliest opportunity.

### Presiding Officers, Poll Clerks and polling station inspectors

3.5 Presiding Officers, Poll Clerks and other front line staff are frequently the only members of your staff that voters will meet in person. It is therefore particularly important that such staff are trained to understand their role and to perform their duties professionally and effectively, and are able to provide a high standard of customer care. It is important for such staff to be able to communicate well with all voters, and so accessibility issues should be covered in training sessions for all external facing staff. You will also need to ensure that polling station staff are trained to set-up polling stations in such a way that takes account of voter needs.

3.6 All polling station staff should be required to attend a face-to-face training session. The training session should address:

- the tasks to be carried out ahead of polling day
- the setting up and management of the polling station
- who can attend a polling station and the procedures to be followed on polling day itself
- the importance for polling station staff to be customer-focused and to offer assistance to all voters, including disabled voters
- the security of referendum stationery, including returned postal votes
- the procedures to be followed at the close of poll
- health and safety issues

3.7 A [template PowerPoint briefing for polling station staff in Great Britain](#) is available, which can be used for your polling station staff training sessions and updated with any additional local information you consider necessary. A [quiz for polling station staff in Great Britain](#) and [role play exercises and scenarios for Great Britain](#) that you can use as a mechanism for testing and embedding learning are also available.

3.8 Additionally, given the importance of ensuring that the ballot paper accounts are completed correctly in order to provide an audit trail of the number of ballot papers issued and to provide the foundation for an accurate verification process, an [exercise on completing the ballot paper accounts](#) is available, which you can use at your training sessions.

3.9 A template [graphical guide to packaging materials at the close of poll](#) is also available, which you could adapt and provide to polling station staff.

3.10 For flexible resourcing to be able to work effectively, you should train Poll Clerks and Presiding Officers in such a way as to ensure that both have the technical knowledge to carry out each other's roles if required and as far as the law permits.

3.11 Polling station inspectors should receive the same training as polling station staff in order for them to be able to be deployed flexibly and carry out polling station duties if required. You should also provide an additional briefing for polling station inspectors, covering items that are specific to their role.

3.12 Both polling station staff and polling station inspectors should be given a copy of the handbook for polling station staff (for staff in [Great Britain](#) or for staff in [Northern Ireland](#) as appropriate) and polling station quick guide ([for staff in Great Britain or for staff in Northern Ireland as appropriate](#)), and be instructed to read both ahead of polling day and to bring their copies with them on polling day itself. Polling station inspectors should be given spare copies of the handbook and quick guide that they can provide to polling stations in the event of polling station staff forgetting to take their copies on polling day.

3.13 In addition, you should provide polling station staff and polling station inspectors with contact numbers for use in the event of any problems. As well as numbers for the election office, this should include a contact number for the police.

## Postal vote issue and opening staff

3.14 You should make arrangements for the briefing of all postal vote issue and opening staff. Briefings on the particular procedures to be followed may be provided to postal vote issue and opening staff immediately prior to commencement of the issuing or opening processes. All staff should, however, be provided with guidance notes in advance.

3.15 Also, you should consider training supervisory staff a day or two in advance of the issuing or opening session so that they are fully aware of their duties and what will be expected of them.

3.16 Whether you are issuing in-house or have contracted out the issuing of postal votes, you should ensure that supervisory staff are appropriately trained to carry out the required quality assurance checks.

3.17 Supervisory staff at postal vote openings should be trained to ensure that the opening procedures and the verification process are correctly followed and an audit trail is maintained.

3.18 Any person who will be undertaking the verification of postal vote identifiers and has been delegated the authority by you to make decisions on postal voting statements should be provided with a copy of the [Commission and Forensic Science Service guidance on signature checking](#), and be instructed to follow it. You should also consider whether any additional training may be appropriate for anyone undertaking this role.

## Verification and count staff

3.19 You should make arrangements for the briefing of all verification and count staff so that they are fully aware of their duties and what will be expected of them. All briefings should, as a minimum, cover the procedures relevant to the roles.

3.20 Prior to the start of the verification and count proceedings, you should undertake a walk-through of the procedures you are expecting everyone to follow so that everyone is aware of what is expected of them at each stage, and how the different roles relate to each other.



Guidance on the principles of an effective verification and count process is contained in [Part E – Verifying and counting the votes](#).

For practical guidance on training staff prior to the verification and count process, see '[Planning for an effective verification and count: a toolkit for Counting Officers](#)'.

## 4 Venues

4.1 Your project plan should cover the identification of suitable venues for all processes that you are responsible for.

4.2 Identifying appropriate venues for all of the various referendum activities should be done as early as possible. The managers of these premises should be contacted at an early stage and, now that the date of the referendum has been confirmed, the necessary booking arrangements should be made. These activities, done at an early stage in the planning process, will highlight where venues may not be available and should allow sufficient time to act on the information and identify alternative premises.

4.3 As part of your review of previous electoral events, you should have undertaken an evaluation of the suitability of venues used. The results of this should be used to inform your planning and to ensure that any identified barriers to access can be overcome.

4.4 Under the Equality Act 2010, service providers have a duty to make reasonable adjustments to avoid putting people with disabilities at a substantial disadvantage compared to people who are not disabled. In order to comply with the duty, you should work closely with people who have a particular expertise in relation to access to premises or facilities for disabled people. The equalities officer at your local authority should be able to provide you with advice and assistance.

4.5 Contingency arrangements should be put in place for all venues to address the risk of the loss of a venue. As part of this you should prepare a list of alternative venues, including making arrangements for the use of stand-by portable polling stations/mobile vehicles and alternative venues for the issue and opening of postal votes and the verification and count if necessary. Staff should be briefed on contingency arrangements: for example in the case of the loss of a polling station on polling day, they could be advised to set up a temporary polling station in their car until alternative arrangements can be made. You should ensure that any changes made to venue location are communicated to campaigners, agents, electors and any others as appropriate.

## Polling stations

4.6 You should undertake an assessment of the suitability of the polling stations you are intending to use.

4.7 Ideally, you 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 some areas there may be little choice available.

4.8 In order to ensure that voters can receive a high-quality service you will need to ensure that access needs are taken into account when planning for and setting up polling stations. As part of your planning, you should ensure that any additional equipment you have identified as required to make the polling station accessible will be delivered and set up in good time for the opening of the poll.

4.9 You should work closely with people who have particular expertise in relation to access to premises. You should be able to demonstrate that an assessment has been conducted of the polling stations to be used at the referendum. Where access problems exist, you should document the problems, identify potential improvements and record any action taken to try to remedy these problems.

4.10 Schools that are publicly funded, including academies and free schools, can be used as polling stations free of charge, and the legislation allows you to require a room in such schools for use as a polling station. In Northern Ireland, this excludes schools that are connected with a nunnery or other religious establishment, or that adjoin or are adjacent to a church or other place of worship. You are also entitled to use, free of charge, any publicly-funded room as a polling station. You will, however, need to pay for any lighting, heating, etc., costs incurred when using such rooms as polling stations. You should liaise with the relevant schools and managers of publicly-funded rooms at the earliest opportunity to confirm that you want to use certain rooms within their premises as polling stations.



The Chief Counting Officer has written to the Secretary of State for Education asking that she and her officials do everything possible to encourage schools in England to make their buildings available for use as polling stations. You can view a copy of her letter [here](#) and the response from the Secretary of State [here](#).

4.11 It is essential that polling stations provide sufficient space for voting to take place.



Further information on polling station voting, including polling station set-up, can be found in [Part C – Administering the poll](#).

## Last-minute changes to polling stations

4.12 There may be circumstances (e.g. flooding, fire, vandalism) when a change of polling station is required at short notice. As part of your planning, you should compile a list of stand-by or portable polling stations that could be used in such circumstances. As local authorities are responsible for designating polling places and polling districts, you should designate a new polling station within the same polling place as far as is possible and practical. As the location of a polling station within a polling place is your responsibility, there is no need to seek local authority approval for such a change.

4.13 If, however, there is a need to change the polling place, local authority agreement will be required<sup>V</sup>. If delegation procedures are in place, you should follow these and contact the person or persons who are entitled to make changes to the scheme of polling places.

4.14 You should amend the notice of situation of polling stations to reflect any changes to your polling stations.

4.15 There are a number of mitigating measures you can take to ensure that electors who are affected by a late change to a polling station are able to vote with minimum disruption. You should have a protocol for what to do in case of a last-minute change. As a minimum, you should:

- if time allows, send out a letter to all affected electors informing them of the change to their polling station
- if time allows, use the local media to disseminate information to the affected electors – for example, through issuing press releases
- put up signs at the old polling station informing electors about the change, including directions to the new one
- display clear and visible signage at the new polling station

## Postal vote issue and opening venues

4.16 You should take into account the following key factors when selecting venues for postal vote issuing and opening sessions:

- lessons learnt from previous electoral events
- volume of postal ballot packs to be issued
- estimated volume of returned postal votes
- intended workflows
- IT requirements
- security and storage requirements
- disabled access, both to and within the venues



Guidance on the layout of postal vote issue and opening venues can be found in [Part D – Absent voting](#).

## Verification and count venue

4.17 You should ensure that the verification and count processes are designed and managed to secure accurate local totals, with a clear audit trail, and that they are transparent, with everything carried out in clear view of all those entitled to attend. Therefore, when selecting the venue for your verification and count, you should consider the following points:

- lessons learnt from previous electoral events
- access arrangements for vehicles and parking
- entrances for those entitled to attend and staff, and for the delivery of the ballot boxes
- disabled access, both to and within the venue
- size of the venue taking into account the space required to conduct the verification and count processes in accordance with the legislation and the CCO's directions, sufficient storage space for parcels, ballot boxes and other equipment, and adequate space for those entitled to attend and observe proceedings at the verification and count
- lighting within the venue
- platform or stage for announcing the local totals, and for making regular announcements throughout the proceedings
- acoustics within the venue
- internal and external IT and communication systems, including those needed for communicating with and transmitting information, including local totals, to the RCO
- facilities for those attending the verification and count
- media requirements
- furniture requirements: if there are insufficient tables and chairs in the venue, for example, these will need to be hired or acquired from another location
- security and storage requirements
- contingency arrangements to address the risk of a loss of venue



Further guidance on preparing for the verification and count can be found in [Part E – Verifying and counting the votes](#).

For practical guidance on the verification and count venue and a checklist of useful materials, see the verification and count resource '[Planning for an effective verification and count: a toolkit for Counting Officers](#)'.

# 5 Managing contractors and suppliers

5.1 You can outsource particular work required to deliver the referendum, but not the responsibility for ensuring compliance with the rules and regulations.

5.2 Do not automatically assume that outsourcing is your only and best option. You should make an assessment of the need to outsource, and your decision should be taken as part of an assessment of the costs, risks and benefits of outsourcing work, as compared to in-house delivery by your staff. Your review of previous electoral events and consideration of the specific requirements for the referendum will help to inform your decision as to whether or not to outsource a particular function or task.

5.3 If outsourcing is considered appropriate, your project plan should cover the management of contractors and suppliers and the development and management of contracts.

## Procurement

5.4 Where a decision has been made to outsource, you should commence the procurement process as soon as possible. Your local authority will have adopted standing orders or regulations relating to procurement and contracts. You should take advice from relevant staff at your local authority on the procedures to be followed and legal requirements for procuring supplies and services. You will also need to have regard to the requirements of the Fees and Charges Order and related guidance.



[The Referendum on the UK's Membership of the European Union \(Counting Officers' and Regional Counting Officers' Charges\) Regulations 2016](#) set out the maximum amounts recoverable by Counting Officers and Regional Counting Officers for their services and expenses in relation to the referendum.

We have produced [Counting Officers' expenses guidance notes](#) and an [FAQ document on Fees and Charges](#) which are available on our website together with [Counting Officers' Expenses Claim Forms](#).

We have also made [The Counting Officers', Regional Counting Officers' and Chief Counting Officers' Accounts \(European Union Referendum\) Regulations 2016](#) which specifies the date by which claims must be received as 23 December 2016.

5.5 All stages of the procurement process should be documented and the risks of outsourcing should be clearly acknowledged, with contingency arrangements identified and built into the process.

5.6 Good public procurement practice recommends obtaining at least three written quotations from prospective suppliers. Some local authorities may, however, have a standing list of approved contractors who have already been through a tendering process and in some instances it may be more effective and economical to use such existing contractors and systems.

5.7 The [contract management checklist](#) highlights key considerations relevant to outsourcing work and managing contracts.

5.8 A detailed specification of requirements is essential for effective procurement, and should be developed for all outsourced work. Suppliers should be able to provide robust information on how they are going to deliver the work as required by the specification.

5.9 When evaluating the bids received, the final price in the suppliers' proposals should not be the only consideration in choosing a contractor. The focus should be on 'value for money', with the final decision being a judgement based on the best combination of the cost of the goods or service and the ability to meet your requirements as laid out in the specification. Work needs to be completed on time and to a high standard, and therefore each bid should be carefully considered to assess exactly what it offers.

5.10 You should take steps to ensure that the selected contractor understands the requirements and has the experience and suitability to undertake the work being outsourced. The [contract management checklist](#) sets out the minimum steps you should take to be satisfied that the company will have the capacity to complete any contracted work on time and to the standard required.

5.11 Contractors may sub-contract work out and you should give prior written consent before sub-contractors are to be used. You should ensure that any sub-contractors are aware of the specific requirements as detailed in the specification.

5.12 Once you have made your final decision, you should notify unsuccessful applicants and be prepared to debrief them should they request it.

5.13 You should have a formal, written contract in place with every contractor to which you have outsourced a function or task. It is essential that statutory requirements and their implications are fully explained wherever contractors are used, and that these requirements are explicitly stated in the contract for any work. Contracts should be developed with advice from other departments of the local authority, for example, legal services and procurement. Experienced managers in these fields can be used to ensure that appropriate and rigorous procurement and contract management procedures are followed, thereby minimising risk.

# Contract management

5.14 The key to effective contract management is continuous and open lines of communication with the contractor, underpinned by clear and robust provisions in the contract as to the quality and timescales expected and required.

5.15 In order to assist contractors and suppliers in delivering work on time, it is essential to keep to agreed timescales for providing the information or data they need to do the job. You should ensure that contractors are aware how electoral registration deadlines may impact on timescales. For example, EROs have until the determination deadline (i.e. 15 June 2016) to make their determination about a person's entitlement to be registered. If they also applied to vote by post, this will impact on the number of postal votes to be included in the last issue. If there is slippage, for example because of the time required to process bulk last minute postal vote applications, you should advise the contractors as soon as possible.

5.16 You should document all stages of the process. In particular, you should keep a formal record in order to be able to demonstrate that the processes are undertaken in accordance with the law.

5.17 Any variations from the agreed specification could result in a breach of legislation and any such breach is the personal responsibility of the CO, so any variations should be formally documented and signed off by you or by someone authorised to act on your behalf.



Further guidance on what to consider if you have outsourced the postal vote issue can be found in [Part D – Absent voting](#).

## Royal Mail

5.18 You should already be in contact with your Royal Mail account manager, and you should continue to liaise with them on a regular basis. At an early stage in your planning process you should take steps to ensure that any business reply licences you hold are up to date.

5.19 It is important that you have early discussions with Royal Mail to ensure that any arrangements you put in place with them in relation to postal voting will help to maximise the time available to postal voters to receive, complete and return their postal vote. For example, you should take steps to ensure that the correct postage will be included on all postal votes being sent to addresses outside the UK.



More information on working with Royal Mail in respect of postal voting can be found in [Part D – Absent voting](#).

## Finding printers

5.20 If you decide that you need to outsource production and are having difficulty finding a suitable printer, the British Printing Industries Federation or Graphic Enterprise Scotland may be contacted for assistance:

British Printing Industries Federation  
Farringdon Point  
29 – 35 Farringdon Road  
London EC1M 3JF  
Tel: 0845 250 7050  
[www.britishprint.com](http://www.britishprint.com)

Graphic Enterprise Scotland  
c/o Maclay, Murray & Spens  
1 George Square  
Glasgow  
G2 1AL

Tel: 07771 865947

[www.graphicenterprisescotland.org](http://www.graphicenterprisescotland.org)

# 6 Maintaining the integrity of the referendum

6.1 In order to ensure that voters and campaigners can have confidence that votes will be cast and counted in the way voters intended, you will need to have in place plans and processes to identify any patterns of activity that might indicate potential electoral fraud. Your plans should include specific steps to identify and deal with any potential electoral fraud, and should also identify how you will communicate your approach to maintaining electoral integrity to support public confidence in the referendum.

## Offences

6.2 There are a number of electoral offences specified in law. The Commission has produced a [factsheet](#) which provides information on these offences.

## Assessing and managing the risk of electoral fraud

6.3 You are uniquely placed to identify incidents and patterns of activity that might indicate electoral fraud in your area. Effective early action to identify and address possible fraud could help to avoid costly police investigations or legal challenges to the result of the referendum.

6.4 You should ensure that you have mechanisms in place to assess the risk of electoral fraud in your voting area, including considering:

- whether there has been a history of allegations of electoral fraud in the voting area at previous polls
- where there is a highly mobile population with a frequent turnover of electors
- where there are electors who may be more vulnerable, for example because of low levels of literacy and/or English language ability, age or infirmity
- where there may be new campaign groups which are not familiar with electoral law and offences

6.5 Your plans for managing the risk of electoral fraud in your area will need to reflect any specific local risks you have identified in addition to any general fraud prevention and detection plans.

6.6 For example you should consider risks associated with houses of multiple occupation, student halls of residence or care homes where other

people may have access to personal mail or where care givers may assist residents in care homes with completing postal vote applications or postal votes.

6.7 Your plans should set out mechanisms for monitoring indicators for possible electoral fraud and setting thresholds for action in response. Although there are no definitive signs of possible electoral fraud, you should be aware of and consider all the data which is available to you, including:

- whether there have been unusual patterns in registration or absent vote applications at previous polls
- whether there have been unusual patterns of rejected ballot papers, including rejected postal ballot packs, at previous polls
- whether there is any unusual pattern of registration or absent vote applications in the period leading up to the referendum

6.8 You should also communicate and explain your approach to tackling fraud in advance of polling day to provide reassurance to voters and campaigners.

6.9 Consideration should be given to sharing the approach to tackling electoral fraud with campaigners and agents at briefing sessions and/or within the information provided to them. You should also consider inviting the police to attend any such briefing sessions and invite them to supply to you any relevant documentation you could include in your information pack.



Following consultation with Returning Officers, police forces and political parties, the Commission has issued a [Code of Conduct for campaigners](#) at elections and referendums. The Code applies to all campaigners, and sets out agreed standards of appropriate behaviour before and during an election or referendum. The Code also makes it clear that if a Returning Officer considers it appropriate to address further specific local risks, and has consulted with relevant national and local parties, the Commission will support them in introducing additional local provisions which go beyond the terms of the nationally agreed Code.

## Dealing with allegations of electoral fraud

6.10 Allegations and cases of electoral fraud will not only have a negative impact on the confidence of electors and campaigners, but they may also have a significant impact on your capacity to manage the referendum process effectively.

6.11 It is therefore crucial that you put in place detailed and robust plans for monitoring and maintaining the integrity of the referendum in your area. This should include working closely with the local police, ensuring you have in place good lines of communication and have agreed an approach for referring any allegations of electoral fraud.

6.12 Every UK police force has a named single point of contact officer (SPOC) for election-related crime. Your local police SPOC will be a key partner to help you to ensure that any possible instances of fraud are quickly identified and dealt with. You should make sure that you are clear who your SPOC is and how you can contact them.

6.13 You should establish and maintain contact with your SPOC from the outset of your pre-referendum planning process, with regular contact scheduled in your project plan. Early discussions with your SPOC should cover your mechanisms for identifying possible fraud and what actions will be taken where any suspicions arise. If you have any problems establishing contact with your SPOC, please contact your [local Commission team](#).

6.14 You should discuss your plans for maintaining the integrity of the referendum with your SPOC at the earliest opportunity. A [checklist of topics](#) that should be considered at any pre-referendum planning meeting between you and your SPOC is available. You should, as part of this meeting, consider the possibility of any joint publicity work that can be carried out with the police, for example, jointly running public awareness campaigns within the voting area to highlight what can be done to help detect and prevent electoral fraud.

6.15 As part of your early liaison with your SPOC you should establish a clear agreement about the division of responsibilities between you and your SPOC, so that there is clarity about each other's roles. In particular, you should agree with your SPOC an approach for referring allegations of fraud you may receive for further investigation where appropriate. For example, will you be the initial point of contact and refer allegations to the SPOC, or will the SPOC be the initial point of contact and advise you of allegations? In addition, you should agree a mechanism for handling evidence, so that the police can carry out any forensic analysis, where necessary.

6.16 You should ensure that all campaigners and their agents understand how to raise specific concerns about electoral fraud relating to the referendum, including what type and level of evidence will be necessary to enable allegations to be investigated by the police. You should also ensure that they understand how allegations will be dealt with, and what information and feedback they should be able to expect about the progress of any investigations.

6.17 The police will investigate any allegations of electoral fraud until, following consultation with the prosecuting authorities (i.e. the Crown Prosecution Service in England and Wales, the Crown Office in Scotland, and the Public Prosecution Service in Northern Ireland), they are either satisfied that no further action is necessary or appropriate, or they forward the case file to the prosecuting authorities for consideration. The police should keep you and, where appropriate, the ERO informed of the progress of the case.

6.18 The Commission and the National Police Chiefs' Council (formerly the Association of Chief Police Officers) have supported the College of Policing to produce a manual of guidance for policing elections in England and Wales, which is also available to download from [the Commission's website](#). Police

Scotland have supported the College of Policing to produce an Authorised Professional Practice on Policing elections specific for Scotland, which is available to download from [the Commission's website](#).



More information for EROs on identifying suspicious registration and absent vote applications can be found in [Part 5 – Absent voting](#), of the Commission's guidance for EROs in Great Britain.

## Dealing with allegations of financial offences by campaigners

6.19 Campaigners must follow rules set out in legislation about how much they can spend at a referendum. The Commission has produced guidance for campaigners outlining the rules on spending. This can be found on [the Commission's website](#). Any queries on referendum spending should be referred to the Electoral Commission's Party Election Finance team via email: [pef@electoralcommission.org.uk](mailto:pef@electoralcommission.org.uk) or telephone: 0333 103 1928.

## Security

6.20 Your project plan should include a review of security arrangements with the local police, taking into account any specific security guidance issued by the Home Office or other agency. You should also consider any security risks as part of your contingency planning exercise and include these in your risk register.

6.21 Your security arrangements should prevent unauthorised access to or use of the ballot papers during all stages of the production process and storage between printing and the poll.

6.22 You should also take all necessary steps to ensure the security of ballot boxes and relevant stationery from the close of poll through to the declaration of the result, particularly where there is a break in proceedings.

6.23 Whichever method of storage you choose, it should be such that you can be satisfied that you have taken all necessary steps to ensure that ballot boxes and other items are kept securely at all times and cannot be interfered with.

6.24 In addition, you should take all necessary steps to ensure that police officers (which can include police community support officers) attend at polling stations or call in during polling day, as appropriate, and discuss any security issues relating to any other aspects of the process including community safety for voters.

# 7 Communications

## Raising awareness

7.1 You must take such steps as you think appropriate to encourage the participation of electors in the referendum, and in carrying out such activity you must have regard to any guidance issued by the Electoral Commission<sup>vi</sup>.

7.2 If you are not also the ERO, you should liaise with them to ensure that any public awareness activity you carry out is aligned with their work and is designed in such a way as to maximise impact ahead of the registration deadline for the referendum. Any public awareness activity and messaging should aim to ensure that everyone who wants to vote has the information they need to be able to do so, and can vote using their preferred method.

7.3 You should explore opportunities to engage local residents in the democratic process and to boost the levels of registration among under-registered groups. And you do not need to do this on your own – opportunities for working with local partners who can reach out to voters in under-registered groups in your area could be a valuable part of your engagement work locally.



Section 125 of the Political Parties, Elections and Referendums Act 2000 places restrictions on the material that publicly funded bodies can publish about the referendum from 27 May to 23 June 2016 (i.e. polling day). Further information on Section 125, including who and what the restrictions cover, is contained in the factsheet available on our [website](#).



General guidance to EROs on working with partners, which could also be of use to COs, is contained in chapter 5 of [Part 1 of the Commission's guidance for EROs in Great Britain](#).

7.4 When planning your public awareness activity you should consider and document:

- the identification of your target audience
- the objectives and success measures of the activity
- risks – identification and mitigation
- resources - financial and staffing

7.5 The Commission will be running a public awareness campaign focusing on providing public information (along with registration messaging before the registration deadline) ahead of the referendum. The campaign will centre around a booklet containing information on how to register and vote, which will be delivered to every household in the UK between 16 and 21 May. The booklet can also be downloaded from the Commission [website](#).

7.6 Awareness will be raised by mass media advertising, working with partners, and public relations activities.



#### **Direction**

The CCO has directed that copies of the Commission's information booklet must not be made available in polling stations. Further information on polling stations and the voting process is included in [Part C – Administering the poll](#).

7.7 The Commission has also provided [resources](#) that can be used locally such as template press releases and tweets.

## Information to electors

7.8 Public awareness activity that provides essential information to electors to enable them to take part in the referendum should reach as wide an audience as possible. You will need to identify appropriate methods of communication (for example posters, written information, flyers, raising at community meetings and with partners) and you should seek advice from relevant staff at your local authority, including experts in the communications department.

7.9 Information required by electors in order to successfully participate may include:

- details of the referendum itself
- the date and hours of poll
- the location of polling stations
- any key deadlines (e.g. deadlines for registering to vote and applying for postal or proxy votes)
- how to vote (i.e. how to mark the ballot paper)
- assistance available to electors (e.g. information for disabled voters)
- how votes are counted
- how the result will be made known

7.10 It is important that public awareness activity provides information that enables electors to take part in the referendum.

7.11 You should ensure that all your outgoing communications provide appropriate contact details to allow anyone to respond and obtain further information.



As part of the Commission's public awareness campaign, a booklet will be delivered to all households in the UK containing the information electors will need to be able to vote with confidence.

The Commission has also provide templates and tools on [its website](#) to support you with providing information on the referendum.

There is also a frequently asked questions page on [About My Vote](#), which includes have FAQs relating to the referendum and which people should be directed to, for example by providing a link from your own web pages to the About My Vote website.

## Media liaison

7.12 Media liaison should be included in your communication plans to support the delivery of the referendum in your voting area. You should ensure that stakeholder coordination and communication is embedded throughout your planning, with particular arrangements in place for working with the media, including:

- strategies for dealing with both proactive communication and media liaison in relation to specific events such as the verification and counting of votes
- dealing with general media enquiries
- reactive handling of any issues that arise in relation to the referendum, for example allegations of electoral fraud

7.13 It is important that media communication is properly managed and managed in a co-ordinated and consistent way to maintain public confidence in the administration of the referendum. To achieve this effectively, you should liaise with the RCO and establish a clear process in liaison with them, which you, the RCO and other COs and your respective communications teams can follow to respond to any issues that arise.

# 8 Accredited observers and Commission representatives

8.1 Observers accredited by the Commission are entitled to observe<sup>vii</sup>:

- the issue and receipt of postal ballot papers
- the poll
- the verification and counting of the votes

8.2 Your project plan should include processes to manage potential enquiries from observers and to support their attendance at the electoral processes they are entitled to attend. This should include providing observers with information on the location and timing of the above processes.

8.3 Commission representatives are also entitled to observe these processes and, in addition, are entitled to observe your working practices<sup>viii</sup>.

8.4 Accredited observers and Commission representatives do not need to give advance notification of where they intend to observe, but will carry with them a photographic identification card issued by the Commission.

## Quick guide to the observer badge types

Observer badge type	Who are they?	Access
 <p>The Electoral Commission Rebecca Brown Commission Representative</p>	Electoral Commission representatives	Same as agents, plus access to the issue of postal votes, and working practices of the CO, RCO and ERO
 <p>The Electoral Commission Jane Doe Valid from 04/04/20XX Valid to 31/12/20XX 150 Accredited Observer</p>	Observers accredited by the Commission	Same as agents, plus access to the issue of postal votes

8.5 If you are in doubt about the status of a particular individual seeking to gain access to referendum processes, you can check the registers of observers on the [Commission's website](#).

8.6 You have a legal duty to have regard to the [Commission's Code of practice for observers](#) when managing the attendance of observers<sup>ix</sup>. Observers will have agreed to comply with the standards of behaviour set out in the Commission's Code of practice. If you think there has been a breach of the Code of practice, please inform your [local Commission team](#).

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- <sup>i</sup> Paragraph 8 Schedule 3 European Union Referendum Act 2015
- <sup>ii</sup> S63 Representation of the People Act 1983 as amended by Rule 16 Schedule 1 European Union Referendum (Conduct) Regulations 2016
- <sup>iii</sup> See s13AB, 13B and 13BA Representation of the People Act 1983 as amended by Rules 4 and 5 Schedule 1 European Union Referendum (Conduct) Regulations 2016
- <sup>iv</sup> Rule 19 European Union Referendum (Conduct) Regulations 2016
- <sup>v</sup> See s18B Representation of the People Act 1983
- <sup>vi</sup> Paragraphs 12(2) and (5) Schedule 3 EU Referendum Act 2015
- <sup>vii</sup> See ss6C and 6D PPERA 2000, Rules 26(1)(g), 45(3)(a) and 45(4)(e) European Union Referendum (Conduct) Regulations 2016
- <sup>viii</sup> See sa6A and 6B PPERA 2000, Rules 26(1)(g), 45(3)(a) and 45(4)(e) European Union Referendum (Conduct) Regulations 2016
- <sup>ix</sup> S6F(7) PPERA 2000