Part B – Planning and organisation

European Parliamentary elections: guidance for Local Returning Officers

In this guidance we use 'must' when we refer to a specific legal requirement. We use 'should' for items we consider to be recommended practice, but which are not legal requirements.

Translations and other formats

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1.1   To plan effectively for the election, 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 stand for election 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

> To be able to achieve the outcome set out in performance standard 1, you will need to develop and implement robust project planning processes. This should include evaluating the planning for and delivery of previous polls and identifying lessons learnt, updating plans as required. To demonstrate that the outcome can be delivered you will need to have in place project planning documentation which is kept under regular review and which reflects lessons learned from previous polls. This part of the guidance sets out what this project planning documentation should cover.
>
> The Commission has produced a template project plan that you may wish to use and adapt to fit your local circumstances. The template includes a number of example deliverables and tasks including all of those that should be included to be able to demonstrate that the outcomes set out in the performance standards can be delivered. In addition to the deliverables and tasks identified in the template you should also add in any other deliverables and tasks you identify as necessary, including ones specific to your local circumstances.

1.3   Before starting your detailed planning, you should set out what you want to achieve and what success would look like. You should liaise with the Regional Returning Officer (RRO) at an early stage to ascertain their objectives and success measures for the election so that you can reflect these in your planning for the election.

1.4   Your project plan should include clearly defined objectives and success measures. The Commission has provided some sample aims and suggested tools that will allow you to measure the extent to which the conduct of the election has been successful as part of the template project plan.

1.5   You must comply with any directions that the RRO has issued requiring you to take specified steps to prepare for the election and to provide any information that you have or are entitled to have, and you should reflect these in your planning where appropriate.

If you have not already done so, you should evaluate the planning for and delivery of previous polls and identify what worked well and what did not, which should assist with informing your planning. Your project plan for the election should also include a plan to evaluate procedures post-election and identify lessons learnt. Further guidance on reviewing election procedures can be found in Part F: After the declaration of results.

1.6   You should ensure that your planning reflects any legislative changes which have come into effect since the last poll. For the 22 May 2014 poll, for example, there are a number of areas in which your processes and practices will need to be reviewed as a consequence of legislative change, such as in relation to postal voting, where there is now the ability to issue postal ballot packs earlier in the election timetable. This guidance reflects all relevant legislative changes and so can be used to support your detailed planning.

1.7   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 election period. Guidance on developing continuity arrangements for these specific processes is provided in the relevant sections throughout this part of the guidance.

1.8   Your project plan should also identify the resources required. 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.

1.9   The Commission has published a timetable containing the statutory deadlines as set out in the election rules which can be used to assist you in your planning.

1.10 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.

1.11 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 Commission has developed 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. It is essential that you identify the staff you will need and make the necessary appointments at the earliest opportunity.

2.2   You should seek advice from your council'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 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 election. In addition to yourself, your project team should include:

- any appointed deputies/deputes
- other election team 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 Local Returning Officer (LRO). Any appointed deputies, known as deputes in Scotland, 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.

The election team

2.8   The election team, with their experience of running elections, should be part of the project team. 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 election.

The Electoral Registration Officer

2.9   If you are not also the 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. Legislation now requires the publication of two additional interim election notices of alteration which will mean more frequent transfers of data than at previous polls. The Commission has published a timetable which includes the dates related to the publication of these notices.

2.10 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 election.

Support staff

2.11 You should identify and ensure staff are available to assist with any public enquiries you may receive in the run-up to the election. 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 election timetable. The Commission has developed a template of FAQ's for frontline staff which you can adapt to fit your local circumstances. A process should be in place for the escalation of more complex enquiries to the election team.

Staff for specific election processes

2.13 As well as establishing your project team and support staff, you will need to appoint staff to help you undertake the various election 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 elections. Staff can also be recruited from among council employees. As LRO you should take all necessary steps to ensure that the local authority provides you with the staff you need to support you in fulfilling your role, as they are required to do by law.

> Information on the payment of fees to staff after an election can be found in Part F: After the declaration of results.

Polling station staff

2.14 You have a legal duty to appoint and pay a Presiding Officer and such Poll Clerks as may be necessary to staff each polling station. This cannot be any person who has been employed by or on behalf of a registered party or individual candidate standing nominated at the election.

2.15 In order to ensure that voters can receive a high-quality service, when deciding on the allocation of electors and staff to polling stations you will need to ensure that polling stations are properly staffed, giving consideration to the factors set out in paragraph 2.19 below.

2.16 The Commission recommends the following ratios (which exclude postal voters) 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 for polling stations with up to the maximum of 2,500 electors.

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

2.18 It is important that when allocating electors and staff to polling stations the reasoning behind the decisions on allocation can be explained. Each decision should be taken on a case by case basis and not for the counting area as a whole.

2.19 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 – as a minimum you should assume that the turnout will be **not less** than the turnout at the last equivalent poll
- voter throughput and flow, including how the voter will move through the voting process from entering to exiting the polling station
- any local or national issues which may affect turnout

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

To be able to achieve the outcome set out in <u>performance standard 1</u>, you will need to decide on the allocation of electors and staff to polling stations, giving consideration to the factors set out in this guidance, in order to ensure that polling stations are properly staffed so that voters can receive a high-quality service. To demonstrate that the outcome can be delivered you will need to set out the approach you have taken to allocating electors and staff to polling stations.

2.21 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 the legislation has been amended to enable voters in a queue at their polling station at 10pm to be issued with a 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 will, however, need to be prepared to respond if there is a queue at one or more polling stations in your area at 10pm.

Example

If you have 1,200 electors allocated to a polling station, you should 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.

2.22 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.

2.23 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 counting area are not easily accessible, it may be helpful to have teams positioned in different parts of the area.

2.24 To be able to deploy staff flexibly on polling day, staff will need to be trained appropriately. Further guidance on training can be found below.

Polling station inspectors

2.25 Polling station inspectors play an important role in the effective management of the poll, including dealing with queries and problems arising at polling stations on polling day.

2.26 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
- expected 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

2.27 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.

2.28 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 the LRO as appropriate. Polling station inspectors provide an essential communication link between polling station staff and the LRO.

2.29 The polling station inspector may be involved in liaising with the election team regarding polling day amendments to the register and 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.

2.30 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.

2.31 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.

2.32 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 has been produced by the Commission. This document also contains a list of what each polling station inspector should receive prior to polling day.

2.33 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-election review process.

Postal vote issue and opening staff

2.34 You should identify staffing requirements for your postal vote issuing and opening sessions. The following staff may be required:

• specially trained supervisory staff
• clerical staff
• IT staff

2.35 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, as a minimum you should assume that the turnout of postal voters will be **not less** than the turnout of postal voters at the last equivalent poll. Also, your review of recent electoral events will give you an indication of how robust your previous staffing assumptions were.

2.36 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.

2.37 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 ballot packs are being correctly collated and that those postal votes that need to go overseas are

being prioritised. Further guidance on managing contractors and suppliers can be found in [Section 4](#), below.

2.38 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 postal vote issue and opening processes are provided in [Part D - Absent Voting](#)

Verification and count staff

2.39 In order to ensure that voters can have confidence that their vote will be counted in the way they intended, you will need to put in place appropriate resources to ensure that the verification and count is timely and that the processes to be followed are designed and managed in such a way as to secure an accurate result. You should identify the number and type of staff you will require to run your verification and count, and make the necessary appointments as soon as possible.

> To be able to achieve the outcome set out in [performance standard 1](#), you will need to put in place appropriate resources to ensure the verification and count is timely and to ensure the verification and count processes are designed and managed to secure an accurate result, with a clear audit trail. To demonstrate that the outcome can be delivered you will need to set out how the verification and counting is to be organised and managed, including the process you followed to arrive at your decision.

2.40 The decision on when to commence verification may have staffing implications, and you will need to plan accordingly. You should liaise with the RRO regarding the arrangements and expected timings for the verification and count and transmission of the local totals. If the verification process is commenced immediately following the close of poll, you should wherever possible not use staff who have been on polling duty all day.

2.41 Typically, the following types of roles make up the overall staffing required at the verification and count:

- A senior officer responsible for the overall operation, assisting you with the organisation of the event, the co-ordination of the verification and count processes, the calculation of local totals and the transmission of local totals to the RRO.
- A responsible officer to supervise a team dealing with the receipt of ballot boxes, postal votes and paperwork at the verification and count venue, and the verification of the unused ballot papers and tendered ballot papers.

- An officer to oversee the secure transportation of the sealed boxes of postal ballot papers to the verification and count venue and to deal with the final opening of postal votes.
- A team of numerate staff to input figures, aggregate totals and ensure that all of the necessary forms and statements are completed accurately and formally signed off, providing an audit trail for the verification and count processes.
- A team of senior staff responsible for managing those staff sorting and counting the votes.
- Teams of staff dealing with the receipt of ballot boxes, postal votes and paperwork, and the verification of unused and tendered ballot papers.
- Counting assistants to accurately sort and count the ballot papers.
- Porters, security staff and door attendants to deal with the security of the site and the management of the facilities within and around the site.
- An officer to oversee the security of ballot boxes and relevant stationery where there is a break in proceedings, to ensure the ballots are stored securely between the conclusion of the verification and the commencement of the count.

> Guidance on the management of the verification and count processes is contained in Part E - Verifying and counting the votes

3 Training

3.1   Your project plan should contain a plan for training which identifies the training needs of both permanent and temporary staff.

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

3.3   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.

3.4   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.

3.5   The RRO may also facilitate training within the region for LROs and their staff. Where this is the case, you should ensure that you and your staff attend the relevant training sessions.

Presiding Officers, Poll Clerks and polling station inspectors

3.6   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 essential 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.

> To be able to achieve the outcome set out in performance standard 1, you will need to ensure that access needs are taken into account when planning for and setting up polling stations and polling station staff are trained to set-up polling stations in such a way that takes account of voter needs. To demonstrate that the outcome can be delivered, you will need to make an assessment regarding access needs, identifying any problems and actions taken to remedy these and you will need to have in place guidance/training to be provided to polling station staff.

3.7   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 need for polling station staff to be customer-focused and to offer assistance to all voters, including disabled voters
- the security of election stationery, including returned postal votes
- the procedures to be followed at the close of poll
- health and safety issues

The Commission has produced a template PowerPoint briefing for polling station staff which can be used for your polling station staff training sessions and updated with any additional local information you consider necessary. The Commission has also produced a Polling station quiz and role play exercises and scenarios that you can use as a mechanism for testing and embedding learning.

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, the Commission has developed an exercise on completing the ballot paper accounts, which you can use at your training sessions.

3.9   The Commission has also developed a template template graphical guide to packaging materials at the close of poll, 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 Commission's handbook for polling station staff and polling station quick guide, 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 team, 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. The briefing of counting assistants, porters, security staff and door attendants can take place just prior to the commencement of the relevant proceedings. They should, however, be issued with guidance notes in advance.

3.20 You should consider training supervisory staff a day or two in advance of the verification and count so that they are fully aware of their duties and what will be expected of them.

3.21 All briefings should, as a minimum, cover the procedures relevant to the role. They should also cover any policy regarding eating, drinking and the use of mobile phones, as well as health and safety. In particular, staff should be briefed on the correct procedures for moving ballot boxes and carrying heavy sacks in order to reduce the risk of any injuries.

3.22 Prior to the start of the verification and count, 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.

4   Venues

4.1   Your project plan should cover the identification of suitable venues for all processes.

4.2   Identifying appropriate venues for all of the various election activities should be done as early as possible. The managers of these premises should be contacted at an early stage and informed of the relevant dates, and the necessary booking arrangements made. These activities, done at an early stage in the planning process, will highlight where venues are not 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. 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 candidates, agents, electors and any others as appropriate.

Polling stations

4.6   You should undertake an evaluation 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 election. 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, may 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. 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.

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 council approval for such a change.

4.13 If, however, there is a need to change the polling place, council agreement will be required. 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
- 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 consider the following points when selecting the venue for your verification and count:

- 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, sufficient storage space for parcels, ballot boxes and other equipment, and adequate space for those entitled to attend and observe proceedings at the count
- lighting within and outside 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 any needed for communicating with and transmitting information, including local totals, to the RRO
- 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

> Guidance on the layout of verification and count venues can be found in Part E - Verifying and counting the votes.

5   Managing contractors and suppliers

5.1   You can outsource particular work required to deliver the election, 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 election will help to inform your decision as to whether or not to outsource a particular function or task.

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

> To be able to achieve the outcome set out in performance standard 1 you will need to put in place arrangements to manage contractors and suppliers to ensure that the work is delivered as required by the specification. To demonstrate that the outcome can be delivered, you will need to have in place arrangements for the management of contractors and suppliers.

Procurement

5.2   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. 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.

5.3   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.

5.4   The Commission has produced a contract management checklist designed to highlight key considerations relevant to outsourcing work and managing contracts.

5.5   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.

5.6   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.

5.7   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.

5.8   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.

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

5.10 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

5.11 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.

5.12 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, you should advise the contractors as soon as possible.

5.13 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.

5.14 Any variations from the agreed specification could result in a breach of legislation and any such breach is the personal responsibility of the LRO, 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

5.15 You should already be in contact with your Royal Mail account manager, and you should continue to liaise with them on a regular basis.

> More information on working with Royal Mail in respect of postal voting can be found in Part D - Absent Voting.

Finding printers

5.16 If you decide that you need to outsource production and are having difficulty finding a suitable printer, the British Printing Industries Federation or in Scotland 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

Graphic Enterprise Scotland
112 George Street
Edinburgh EH2 4LH
Tel: 0131 220 4353
www.graphicenterprisescotland.org

6 Maintaining the integrity of the election

6.1   In order to ensure that voters can have confidence that their vote will be counted in the way they intended, you will need to have in place processes to identify any patterns of activity that might indicate potential integrity problems, including what steps are to be taken to deal with any such problems.

> To be able to achieve the outcome set out in performance standard 1, you will need to have in place processes to identify any patterns of activity that might indicate potential integrity problems, including what steps are to be taken to deal with any such problems. To demonstrate that the outcome can be delivered, you will need to have in place processes for dealing with integrity problems.

Offences

6.2   There are a number of offences specified in electoral law. Information on these offences can be found on the Commission's website.

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 address possible fraud could help to avoid costly police investigations or legal challenges to the results of elections.

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

- Whether there has been a history of allegations of electoral fraud in the area
- Whether there are any strong personal disagreements between candidates as well as political arguments.

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

6.6   Your plans should also set out mechanisms for monitoring indicators of possible electoral fraud. 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 as RO and to the ERO for the local authority area, including:

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

6.7   In some cases, where there is a significant risk of electoral fraud allegations, you should also consider communicating your approach to tackling fraud to provide reassurance to voters and campaigners.

> The Commission has produced a code of conduct for campaigners which sets out a summary of the law and offers advice about how these individuals should conduct themselves during an election or referendum campaign. The major political parties require candidates to abide by the code of conduct, however, where individual candidates, or candidates representing minority parties, are standing for election, there may be merit in obtaining local sign-up to the code by all candidates.

Dealing with allegations of electoral fraud

6.8   Your local police Single Point of Contact (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 establish and maintain contact with your SPOC, with regular contact scheduled in your project plan.

6.9   You should make sure that you are clear who your SPOC is and how you can contact them. If you have any problems establishing contact with your SPOC, please contact your local Commission team.

6.10 Early discussions with your SPOC should cover your mechanisms for identifying possible fraud and what actions should be taken where any suspicions arise. As part of your early liaison with your SPOC you should establish an agreement about the division of responsibilities between you and your SPOC, so that there is early clarity about each other's roles.

6.11 You should also agree with your SPOC an approach for referring allegations of fraud you may receive for further investigation where appropriate.

6.12 In addition, you should also agree a mechanism for handling evidence, so that the police can carry out any forensic analysis, where necessary.

6.13 The police will investigate any allegations of fraud until, following consultation with the Crown Prosecution Service (CPS), they are either satisfied that no further action is necessary or appropriate, or they forward the case file to the CPS for prosecution. The police should keep you as RO and, where appropriate, the ERO informed of the progress of the case.

6.14 If you need additional information or advice on the handling and referral of allegations of electoral fraud you can contact:

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

> 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.

Dealing with allegations of financial offences

6.15 Parties, candidates and agents are subject to a financial regime under electoral legislation. If you have any queries on election spending contact your local Commission office.

Security

6.16 Your project plan should include a review of security arrangements with the local police. You should also consider any security risks as part of your contingency planning exercise and include these in your risk register.

6.17 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.

6.18 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 local totals, particularly where a break in proceedings. Where the whole or any part of the period between 7pm and 9am on the next day is excluded, you have a legal duty to place the documents under your seal and to take proper precautions for the security of the papers and documents. You should liaise with your SPOC on this.

6.19 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.

6.20 In addition, you should take all necessary steps to ensure that police officers (which now includes police community support officers in England and Wales), 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 Raising awareness

7.1   You have a legal duty to take such steps as you think appropriate to encourage the participation of electors in the election in your area, and in carrying out such activity you must have regard to any guidance issued by the Electoral Commission. The RRO also has a duty to encourage the participation of electors. Activity undertaken at a local authority level should be co-ordinated with the RRO's strategy and plans.

7.2   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

Information to electors

7.3   In order to effectively communicate information to electors you should consider who you want to reach through your awareness activity and the method of communication to be used. You should take advice and seek input from relevant staff at your local authority such as those in the communications department. You should also ensure that you co-ordinate your local activity with any activity undertaken by the RRO, and engage with any communication networks set up for the purpose of the European Parliamentary elections.

7.4   Information covers any information required by the elector in order to successfully participate. This may include information on:

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

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

The Commission will provide templates and tools on our website to support your public awareness work on encouraging voter registration. There is also a frequently asked questions page on About My Vote, which will have FAQs relating to the elections and which people should be directed to, for example by providing a link from your own web pages to the About My Vote website. The web address for the FAQs page is www.aboutmyvote.co.uk/faq.

8 Accredited observers and Commission representatives

8.1   Observers accredited by the Commission are entitled to observe:

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

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.

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
	Electoral Commission representatives	Same as candidates and agents, plus access to the issue of postal votes, and working practices of the RRO, LRO and ERO
	Observers accredited by the Commission	Same as candidates and 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 election 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. Observers are required 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 office](#).