

# Part C – Administering the poll

European Parliamentary election on 23  
May 2019: guidance for Local Returning  
Officers in Great Britain

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 Parties, candidates and agents

## Electoral deadlines in the South West electoral region

As a result of a bank holiday in Gibraltar on 29 April and on 1 May 2019, some electoral deadlines in the South West electoral region are different to the deadlines elsewhere in Great Britain. Where this is the case, we have included the South West deadline in brackets alongside the deadline for the rest of Great Britain.

## Your role and the role of the Regional Returning Officer

1.1 As Local Returning Officer (LRO), you are personally responsible for the administration of the election in your local authority area, i.e. the counting area. However, as stated in [Part A](#), the Regional Returning Officer (RRO) may give advice on how you should or directions on how you must carry out any or all of your functions. The RRO is responsible for accepting nomination papers at this election. We have produced [guidance for RROs](#) that covers their role and responsibilities.

### Guidance for parties, candidates and agents

1.2 Candidates and parties are required by law to follow certain rules regarding how much they can spend, who they can accept donations from, and what they must report after the election.

1.3 You should ensure that parties, candidates and election agents (as appropriate) are issued with information on calculating the expenses limit (including the electorate figure), spending returns and declarations in order to enable them to meet reporting requirements.

1.4 The RRO is responsible for ensuring that information on the election process and spending is easily available for parties, candidates and agents at the European Parliamentary election. You should liaise with the RRO at an early stage to understand their plans for coordinating engagement with candidates and agents and disseminating information to them so that you can reflect this in your own planning, and can deal with enquiries from parties, candidates and agents at the election.

1.5 You should liaise with the RRO to determine what information they require from you for sharing with parties, candidates and agents and how this

information can best be disseminated, whether centrally by the RRO and/or locally by you.

## Briefings for parties, candidates and agents

1.6 The RRO will give guidance or direct you on any briefing sessions that they wish you to provide on the election process, including on your local arrangements, in addition to any briefings that they are carrying out. This advice or direction may contain the topics and details that the RRO will require you to cover in any such briefings. The topics are likely to include integrity issues and the verification and count arrangements.

## Supply of the register

1.7 Although not required for the nomination process, as there is no requirement for nominations to be subscribed by registered electors, an individual candidate (i.e. those not included on a party list) or an election agent of a party fielding a list of candidates at the election can request a copy of the full electoral register and absent voters lists for every counting area within the region in which the candidate or party list is standing, for electoral purposes.

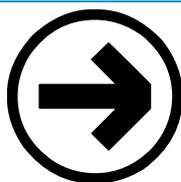
1.8 Registers and absent voters lists can only be supplied if the candidate or the election agent (as appropriate) has made a written request to the ERO. The request can only be made once a person has become an individual candidate or once a party has submitted a list of candidates and appointed an election agent.



For further details on when a person becomes a candidate and when a party fielding a list of candidates can appoint an election agent, see [Part 2a](#) and [Part 2b](#) of our guidance for candidates and agents.

1.9 The Commission has produced template [electoral register](#) and [absent voters list](#) request forms that candidates and election agents can use.

1.10 The ERO should liaise with the RRO about their plans for managing or coordinating requests from and supply of copies of the register to candidates and agents.



Detailed information on access and supply of the full electoral register and absent voters lists to candidates, registered political parties (who can request a copy at any time) and others can be found in [Part 4: Maintaining the register throughout the year](#) of our guidance for EROs.

# Agents at the election

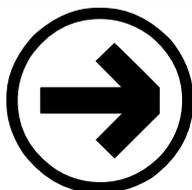
1.11 The Secretary of State has to be notified in writing of the appointment of the national election agent for a party standing in more than one electoral region. It is the RRO who will be responsible for receiving all other notifications of appointment of election agents and sub-agents.

1.12 The RRO is required to publish a notice setting out the name and office address of any election agent and sub-agent and, in the case of a sub-agent, the part of the electoral region for which they are appointed to act, and will provide a copy of the notice (and of any updates if an agent's appointment is revoked, or an agent dies, and a new agent is appointed) to you for local publication. You should publish a copy of that notice in the counting area.

1.13 You should liaise with the RRO to ensure you have a mechanism for contacting any election agents and sub-agents, so you can notify them of any local arrangements and briefings, taking into account the communication arrangements the RRO has in place.

1.14 You are responsible for receiving the notifications of appointment of postal voting, polling and counting agents.

1.15 Polling and counting agents can be appointed by election agents, sub-agents or anyone authorised in writing by them. Individual candidates or anyone authorised in writing by them can also appoint polling and counting agents. Postal vote agents can only be appointed by election agents and sub-agents.



For further details on the role of these agents, see [Part 5: Your right to attend key electoral events](#) of our candidates and agents guidance.

1.16 You are required to ensure that all appointed agents are given a copy of the relevant secrecy requirements for [opening of postal votes](#), [the poll](#) and [the count](#) which we have published on our website. We have also produced bi-lingual versions in English and Welsh for Returning Officers in Wales to provide to those attending the [opening of postal votes](#), [the poll](#) and [the count](#).

## The opening of postal votes

1.17 Postal voting agents are permitted to observe the opening of the postal voters' ballot box, the opening of returned postal votes and the checking of signatures and dates of birth provided on returned postal voting statements. You must be given written notice of the name and address of any postal voting agents before the start of any particular session that the agents are seeking to

attend. A [form for the notification of appointment of a postal voting agent](#) has been developed by the Commission.

1.18 You must give election agents and any sub-agents who have been appointed at least 48 hours' notice of the time and place of any postal vote opening session and the number of agents an election agent or sub-agent may appoint to attend each opening.

### **The poll**

1.19 Polling agents are entitled by law to access polling stations for the purpose of detecting personation. They can also observe the procedures to be followed inside a polling station.

1.20 You must be notified in writing of any polling agents that have been appointed by not later than five working days before the poll (i.e. by not later than 16 May 2019) for their appointment to be in force for the poll. A [form for the notification of appointment of a polling agent](#) has been developed by the Commission.

1.21 A polling agent can be appointed to a particular polling station or stations, or to all polling stations within the counting area. The same polling agents may be appointed to attend more than one polling station. There is no limit to the number of polling agents that may be appointed, but not more than one polling agent on behalf of the same party or individual candidate may be admitted into a particular polling station at any time.

### **The count**

1.22 Counting agents can be appointed to observe the verification and counting processes.

1.23 You must be notified in writing of the appointment of counting agents by not later than five working days before the poll (i.e. by 16 **May 2019**) for their appointment to be in force for the verification and count.

1.24 A [form for the notification of appointment of a counting agent](#) has been developed by the Commission. You are required to give counting agents who have been appointed notice in writing of the time and place at which the verification and count will begin.

1.25 You are permitted to limit the number of counting agents but the number that may be appointed by each party or individual candidate must be the same and, unless there are special circumstances, must not be less than the number obtained by dividing the number of counting assistants (i.e. those staff employed in the counting) by the number of parties and individual candidates.

1.26 When determining the maximum number of counting agents, each party and individual candidate should, as far as possible, be permitted to appoint sufficient numbers of counting agents to enable full and proper scrutiny of the

verification and count processes. You should, however, consider any health and safety implications, including fire regulations for the verification and count venue, when deciding on maximum numbers of counting agents.

1.27 Only one of the counting agents for each party or individual candidate is entitled to be designated to be able to request a recount at the conclusion of a count or recount. Such designations must be made at the time that the counting agent appointment is made to you. The Commission's form for the notification of the appointment of counting agents makes provision for any such designated counting agent to be indicated on the form.

# 2 Production of notices, poll cards and ballot papers

## Production and publication of notices

2.1 You are required to publish notices by posting them in a conspicuous place within the counting area. This should include local authority offices, noticeboards, libraries and other public buildings. The notice may also be given in such other manner as you think fit.

2.2 In order to ensure that voters can receive the information they need, in an accessible format and within time for them to cast their vote, you should ensure that information on the poll, including the notice of election and notice of poll, is easily accessible to voters, such as through the local authority website.

2.3 If you are making information available on your website you should ensure it is accessible to all voters. For example, if you are providing information in PDF format, you should be aware that if certain steps are not followed when creating PDFs they may not be compatible with screen readers and other assistive technologies. The UK Government has produced [a guide to producing accessible PDFs](#) you can refer to. You could also speak to your authority's equalities officer for advice.

2.4 In accordance with data protection legislation, you will need to consider whether it is appropriate or necessary for the notices to remain published, on your website or elsewhere, beyond the expiry of the petition period for that election. Where the notices serve specific purposes, i.e. advising who will be a candidate at the election, once the election is over, and the opportunity to question that election has passed, they serve no further purpose. Therefore, you should either remove the notices, or remove the personal data contained in the notices, once the petition deadline for the election has passed.

2.5 Data protection legislation does permit personal data to be stored for longer periods if the data will be processed solely for archiving purposes in the public interest, or for scientific, historical, or statistical purposes and subject to the implementation of appropriate safeguards. For notices of election results, for example, you should retain these on your website as they are for public interest and historical and statistical purposes.



To be able to achieve the outcome set out in [performance standard 1](#), you will need to ensure that information on the poll, including the notice of election and notice of poll (which is included in the statement of parties and individual candidates nominated), is easily accessible to voters, such as through the local authority website.

To demonstrate that the outcome can be delivered you will need to ensure that information on the poll can be easily accessed through the local authority website.



See [Part B – Planning and organisation](#) for more general guidance on communicating information to electors.

2.6 You should have robust proof-checking processes in place to ensure that there are no errors on the notices you are required to publish. Having robust proof checking processes in place could help detect any errors and avoid any potential data breaches before they occur.



To be able to achieve the outcome set out in [performance standard 1](#), you will need to ensure that you have robust processes in place for ensuring that there are no errors on the notice(s) of election. To demonstrate that the outcome can be delivered you will need to have in place processes for the proof-checking of the notice(s).

## Translation and formats of notices

2.7 You are required, where you consider it appropriate to do so and considering any advice and any direction given by the RRO, to ensure that notices are translated or provided in another format. You may produce them:

- in Braille
- in languages other than English (or in Wales, English and Welsh)
- using graphical representations
- in audio format
- using any other means of making information accessible

2.8 The nomination form and the ballot paper cannot be produced in any other language or format. However, both the enlarged hand-held and display copies of the ballot paper to be displayed in polling stations must have the words 'Vote only once by putting a cross [X] in the box next to your choice' printed at the top of the paper, and these words may be translated into languages other than English or, in Wales, English and Welsh.

## Notice of election

2.9 The RRO must prepare and send to you a copy of the notice of election, which you are required to publish in the counting area.

## Statement of parties and individual candidates nominated

2.10 If there are no objections to nomination papers or lists of candidates, the RRO is required to publish a statement of parties and individual candidates

nominated for the electoral region at the close of the period for making objections, which is 5pm, 19 working days before the poll (i.e. **5pm on 25 April 2019 (5pm on 24 April 2019 in the South West electoral region)**). If there are any objections, the RRO must publish the notice once these have been resolved and by not later than 4pm, 18 working days before the poll (i.e. **4pm on 26 April 2019(4pm on 25 April 2019 in the South West electoral region)**).

2.11 The RRO must prepare and send to you a copy of the statement of parties and individual candidates nominated as soon as it has been published, which you are required to publish in the counting area as soon as practicable after receiving it.

2.12 If the election is to be contested, the statement of parties and individual candidates nominated provided to you by the RRO must include the notice of poll setting out the date and hours of the poll. If the election is not contested, the statement must include a declaration that all of the candidates shown have been elected.

## Notice of the situation of polling stations

2.13 No later than the last date for the publication of the notice of poll you are required to give notice of:

- the situation of each polling station in the counting area
- the description of voters entitled to vote there

2.14 You must give a copy of the notice of situation of polling stations and descriptions of voters entitled to vote there to all election agents. You should also give a copy of the notice to all sub-agents. You should liaise with the RRO about how best to discharge this duty, including whether the notice will be disseminated centrally by the RRO or whether this should be done directly by you. You should also be prepared to make these notices available to any accredited observers on request.

2.15 You should ensure that robust you have robust proof-checking processes in place to ensure that there are no errors on the notice of situation of polling stations.

2.16 If the election is contested and the RRO receives proof of the death of an individual candidate or a candidate on a party list, there is no provision for the poll to be countermanded or abandoned. The RRO will, however, ask you to provide Presiding Officers with a notice to be displayed in every compartment of every polling station to inform voters that the candidate has died.

# Production of poll cards

2.17 Each poll card must follow the prescribed form in the election rules. You must ensure that you follow the separate forms for poll cards for electors set to vote:

- at a polling station
- by post
- by post as a proxy

2.18 In the case of an anonymous elector, the name and address of the anonymous elector are to be omitted.

2.19 You will need to dispatch your poll card data to your printers. and you should liaise closely with the ERO to agree a schedule of when and how the revised register data will be available.

2.20 For the poll on 23 May 2019, EROs will be required for the first time to publish two interim election notices of alteration in addition to the final election notice of alteration. For this poll, following publication of the notice of election, the register will be updated by:

- the first interim election notice of alteration published 19 working days before the poll on 25 April<sup>1</sup>. (**25 April 2019 (24 April 2019 in the South West electoral region)**).
- the second interim election notice of alteration published between 26 April and 15 May( 24 April and 15 May **in the South West electoral region**) on a date determined by the ERO
- the final election notice of alteration published on 16 May

2.21 An update of the registration data resulting from each of the notices of alteration should be sent to your printers as soon as practicable to enable the production of poll cards for new electors.

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<sup>1</sup> In practice there will be no need to publish the 1 May monthly notice of alteration, as any changes to the register that would have been included on that notice will already have been included in the first interim election notice of alteration.



Guidance for EROs on the publication of election notices of alteration is contained in [Part 4: Maintaining the register throughout the year](#) of our guidance for EROs.

2.22 If you are not also the ERO, you should liaise closely with the ERO to agree a schedule of when and how the revised register data will be available.

2.23 If you are outsourcing the production of poll cards, you should ensure that your software is able to produce a data file that your printers can use to produce the materials to the specification required. At an early stage in discussions with suppliers you should address in what format you will supply the data and in what format they will send you any proofs, and this should be included in your specification and contract.

2.24 If you send registration data to a contractor to produce poll cards for the election, you are using a processor. As a data controller, data protection legislation imposes a legal obligation when using a processor to formalise the working relationship in a contract which sets out:

- the subject matter, nature and purpose of the processing;
- the obligations and rights of the data controller;
- duration of the processing; and
- the types of personal data and categories of data subjects.

2.25 In addition, the contract must set out specific obligations on the processor, including that they:

- comply with your instructions
- are subject to a duty of confidentiality
- keep personal data secure and notify you of any breach
- maintain written records of the processing activities they carry out for you
- only use a sub-processor with your consent
- submit to audits and inspections and provide you with whatever information you need to ensure compliance with data protection requirements
- delete or return all personal data to you as requested at the end of the contract.

2.26 You should ensure your agreement/contract specifically confirms that:

- electoral registration data held by the processor should be destroyed as soon as possible after polling day.
- information from the full electoral register cannot be disclosed at any time, confirming that they will not disclose data to any unauthorised party; and
- after the election, they will return any discs and paper records provided to them and securely destroy any other electronic or paper copies of the data in line with the Information Commissioner's guidelines.



Further details on the management of contractors and suppliers can be found in [Part B – Planning and organisation](#)

2.27 You should conduct a test-run by submitting sample data to the printers in advance of 'live' data being submitted. This will also enable pre-proofs to be developed, so that it is clear which part of the data should go where on the poll card.

2.28 You should also liaise with your Royal Mail contact (or other commercial delivery firm) at an early stage to ensure that you have appropriate licences in place and that the poll card meets specific delivery requirements.

2.29 Regardless of whether you have outsourced the production of poll cards you remain responsible for ensuring that they are produced in accordance with the legislation. You should therefore ensure that you have arrangements in place which enable you to quality-assure the whole process.

2.30 In order to ensure that voters receive the information they need, you should have in place a process for checking live proofs of poll cards, including those for absent voters, as well as arrangements to check the actual stationery being produced, which will highlight if any of the signed-off proofs have been inadvertently altered.

2.31 We have produced a [proof checking factsheet](#) which you can use to help you quality assure the whole process. Having robust proof checking processes in place could help detect any errors and avoid any potential data breaches before they occur.



To be able to achieve the outcome set out in [performance standard 1](#), you will need to ensure you have robust processes in place for ensuring that there are no errors on poll cards. To demonstrate that the outcome can be delivered you will need to have in place processes for the proof-checking of poll cards.

2.32 EROs must publish two interim election notices of alteration before publishing the final election notice of alteration on the fifth working day before the poll (i.e. Thursday 16 May 2019). These notices support the prompt dispatch of poll cards to those electors who have applied to register close to the registration deadline.

2.33 The first interim notice of alteration must be published on the day of the deadline for nominations, which is the nineteenth working day before the poll. The second interim notice must be published between the eighteenth and sixth working day before the poll (inclusive). If you are not also the ERO, you should liaise with them to ensure that the timing of the publication of the second interim notice can support the production of your second wave of poll cards.

2.34 An update of the registration data resulting from each of the notices of alteration should be sent to your printers as soon as practicable to enable the production of poll cards for new electors.



Further information on interim notices is included in Part 4 – Maintaining the register throughout the year of the Commission’s guidance for EROs.



Further details on the management of contractors and suppliers can be found in Part B – Planning and organisation. We have also produced a contract development checklist to support you in your work with contractors/suppliers.

## Poll card delivery

2.35 You are required to send out poll cards as soon as practicable after the publication of the notice of election.

2.36 In order to ensure that voters receive the information they need and within time for them to cast their vote you should ensure that poll cards can be received by voters as soon as possible so that they have the maximum amount of time to change their registration details or apply for an absent vote.

2.37 You will need to make an assessment of the optimum distribution date for poll cards and should focus on when poll cards can be expected to be received by electors.



To be able to achieve the outcome set out in [performance standard 1](#), you will need to ensure that poll cards can be received by voters as soon as possible so that they have the maximum amount of time to act on the information. To demonstrate that the outcome can be delivered, you will need to set out information on the method for delivery of poll cards, including an estimation of when poll cards will be delivered.

2.38 Poll cards may be delivered by hand, by post, or by some other method determined by you as the most appropriate for the counting area.

### Delivery by hand

2.39 If you decide to deliver poll cards by hand you should plan for how this will work in practice. You should appoint sufficient staff to ensure that poll cards can be received by voters as soon as possible to maximise the time they have to change their registration details or apply for an absent vote. You should clearly set out in your instructions the last day by which you would expect all poll cards to have been delivered.

2.40 You should ensure that staff are aware of data protection considerations, and should consider requiring staff to confirm in writing at the point of recruitment, that they will abide by your data protection policy.

2.41 You should also have in place a mechanism for monitoring delivery, with a view to ensuring that poll cards have been delivered across the whole of the counting area and to agreed timeframes. This may include requiring delivery staff to fill in log sheets and having supervisors carry out spot-checks.

### **Delivery by post**

2.42 You may use Royal Mail or any other commercial delivery firm for the delivery of poll cards. If you are delivering poll cards by post, you should liaise with your postal services provider to agree timescales for delivery and obtain any proof of postage that the firm provides.

2.43 You should also have in place a mechanism for monitoring the delivery of poll cards, with a view to ensuring that they have been delivered across the whole of the counting area and to agreed timeframes. If possible, you should have arrangements in place to track deliveries in order to assist with responding to any enquiries from electors.

2.44 Your contingency planning should address how you would issue any poll cards in the event that Royal Mail or the commercial delivery firm you have contracted are unable to deliver the poll cards, for example, due to industrial action.

2.45 A poll card must be sent to the elector's qualifying address or, in the case of a proxy, to the proxy's address as shown in the list of proxies.

2.46 An anonymous elector's poll card must be sent in a covering envelope to the elector's qualifying address or, where a different address has been specified on their registration application, the poll card must be sent to that other address.

## **Production of ballot papers**

2.47 You are responsible for the production of the ballot papers unless the RRO directs otherwise. The form of the ballot paper is prescribed in legislation and you have a legal duty to follow this precisely. The RRO may make regional arrangements for the form of the ballot paper and in any case you should liaise with them regarding the form of the ballot papers as soon as possible.

2.48 Ballot papers for postal voters and for polling station use must be the same in form, except that the official mark may be different if desired.

2.49 The colour of European Parliamentary election ballot papers is not prescribed. Tendered ballot papers are required by law to be a different colour

from the ordinary ballot papers. You should liaise with the RRO about the colour of the ballot papers to be used at the poll.

## The 'official mark'

2.50 An appropriate security mark – the 'official mark' is required by law to be added to the ballot paper.

2.51 The mark should be distinctive and does not have to be a perforation added at the time of issue of the ballot paper, although stamping instruments may still be used to create a perforating official mark. It could be a printed emblem or mark or a special printing device such as a watermark. It should be capable of being seen on the front of the ballot paper so that it can be seen at the count without having to turn the ballot paper over.

2.52 If ballot papers are to be printed locally, the RRO may advise or direct you to use a particular official mark, or require that it contain specific features. You should liaise with the RRO regarding the official mark to be used on the ballot paper.

2.53 The official mark:

- Can be the same for all ballot papers at the election or different official marks can be used for different purposes at the same election, for example one for postal votes and another for polling station ballot papers.
- Cannot be re-used for five years for elections to the same counting area.

## Individual candidate and party list details

2.54 The RRO will provide you with the individual candidate and party list details which are to appear on the ballot paper.

2.55 Parties, party list candidates and individual candidates must appear on the ballot paper as listed as in the statement of parties and individual candidates nominated. The directions for printing set out what information from the statement of parties and individual candidates must appear on the ballot paper and how they must be presented.

2.56 The directions for printing ballot papers in the election rules do not allow a party name or description to be printed in block capitals on the ballot paper. Therefore, even if a party has registered their name or a description with the Commission in block capitals, the name or description must be printed on ballot papers in the same large type.

2.57 However, words within a party name or description can have initial capital letters and where this is the case, they should be printed this way on the ballot papers (for example, Liberal Democrat Party). Where the party name or description contains an acronym which is shown on the register of political

parties in capital letters, each letter of the acronym should be printed on the ballot paper in the same way (for example, UKIP).

2.58 If a party has requested it, the requested emblem of the party must be printed to the right of the party's name and description (if any). The maximum size of an emblem on the ballot paper is set by the directions for printing in the election rules. When adding a party emblem to a ballot paper, the shape of the emblem should not be altered.

2.59 You should ensure that the emblem is in the same form as the registered emblem – for example, do not stretch emblems into square shapes if they are not registered as square images, as this would have the effect of altering their appearance.

## Form of the reverse of the ballot paper

2.60 The RRO may give guidance or direct you regarding the various elements that need to be included on the back of the ballot paper.

2.61 The following information is required by law to be included on the back of the ballot paper in the following format:

No. [ballot paper number]

[other unique identifying mark]

Election for the [local counting area name] local counting area of the European Electoral Region of [name of electoral region] on [day/month]. 20[xx].

2.62 The ballot paper number and other unique identifying mark must be printed close to each other.

2.63 The ballot paper number:

- should be unique for each ballot paper in the counting area
- must be printed on the back of the ballot paper

2.64 Ballot paper numbers should run consecutively, but do not have to start at '1'.

2.65 The unique identifying mark may be letters and numbers and could be a repeat of the ballot paper number with the addition of a prefix or a suffix. Also, a unique identifying mark can be, but does not have to be, a barcode. It is not the same as the official mark.

2.66 The unique identifying mark:

- should be unique for each ballot paper
- can be re-used at the next poll
- must be printed on the back of the ballot paper

## Printing of ballot papers

2.67 The ballot paper must be printed in accordance with the directions for printing in the appendix to the election rules and in line with any guidance or directions issue by the RRO, who is responsible for ensuring that the ballot papers are consistent across the electoral region.

2.68 The height of the rows on the ballot paper is prescribed in the directions for printing, which means that the size of the ballot paper is determined by the number of parties and individual candidates standing for election. You should ensure that you check with your print supplier at an early stage to establish the maximum size of ballot paper that they can print, and if necessary, have contingency arrangements in place in the event that a larger ballot paper is required. You should liaise with the RRO to ensure that the ballot papers can be printed in accordance with any guidance or directions from them, regardless of the number of parties and individual candidates standing for election.

2.69 If you send data to a contractor to produce ballot papers for the election, you are using a processor. As a data controller, data protection legislation imposes a legal obligation when using a processor to formalise the working relationship in a contract which sets out:

- the subject matter, nature and purpose of the processing;
- the obligations and rights of the data controller;
- duration of the processing; and
- the types of personal data and categories of data subjects.

2.70 In addition, the contract must set out specific obligations on the processor, including that they:

- comply with your instructions
- are subject to a duty of confidentiality
- keep personal data secure and notify you of any breach
- maintain written records of the processing activities they carry out for you
- only use a sub-processor with your consent
- submit to audits and inspections and provide you with whatever information you need to ensure compliance with data protection requirements
- delete or return all personal data to you as requested at the end of the contract

2.71 The printing of ballot papers should begin as soon as possible after the deadline for withdrawals has passed and final proofs have been signed off. You should have robust proof-checking processes in place, as well as arrangements to check the ballot papers whilst being printed, which will highlight if any of the signed-off proofs have been inadvertently altered. This could include, for example, ensuring that proofs are checked twice by at least two people.



To be able to achieve the outcome set out in [performance standard 1](#) you will need to ensure you have robust processes in place for ensuring that there are no errors on the ballot papers. To demonstrate that the outcome can be delivered, you will need to have in place a process for proof-checking ballot papers, as well as arrangements to check the ballot papers whilst being printed, which will highlight if any of the signed-off proofs have been inadvertently altered.

2.72 When proof-checking ballot papers, you should check that:

- every party and candidate is included on the ballot paper
- every detail on the ballot paper is spelt correctly
- every emblem that has been validly requested has been included and matches the party's entry in the Commission's register
- all party descriptions and emblems have been printed in the line for the correct party
- where an individual candidate has chosen to use a description, that this has been printed in the line for the correct candidate
- the voting instructions at the top of the ballot paper match the legislative requirements
- the ballot papers have been cut to the correct size
- the official mark has been included

2.73 Once you have received the printed ballot papers, you should carry out a final check before any ballot papers are issued either at a postal vote issuing session or supplied to a polling station. This should be done by checking at least the first and last ballot paper in every book and by checking that the ballot paper numbers in each book or packet run sequentially.



General guidance on the management of contractors and suppliers and on monitoring their work can be found in [Part B: Planning and Organisation](#). [We have also produced a contract development checklist to support you in your work with contractors/suppliers.](#)

[We have also produced a proof-checking factsheet which you can use to help you quality assure the whole process.](#)

2.74 Careful consideration needs to be given to the number of ballot papers that will need to be printed to allow you to allocate a sufficient number of ballot papers to polling stations and issue postal ballot packs. You should base your print-run on 100% turnout of eligible electors. There are significant risks attached to printing ballot papers based on lower turnout levels. For example, if you start running out of ballot papers on polling day it will be more difficult at that stage to print additional ballot papers and send these to the affected polling stations in a timely manner.

2.75 If you decide for any reason not to print ballot papers based on 100% turnout of eligible electorate, you should carefully assess the risks.

2.76 As part of your risk assessment you should consider:

- the particular context of these polls
- any particular local circumstances
- projected turnout – as a minimum you should assume that the turnout will be **not less** than the turnout at the last equivalent poll
- any local or national issues which may affect turnout
- whether having a stock of additional ballot papers ready for rapid delivery to polling stations is preferable, in terms of your ability to respond to additional demand, and more cost effective than printing ballot papers on polling day

2.77 You should also take steps to ensure that additional ballot papers can be printed at short notice if required and decide how polling station staff would be briefed should this situation occur.

2.78 Guidance on the allocation of ballot papers to polling stations can be found in paragraph **3.14**.

## Ballot paper security

2.79 Once the official mark is printed on your ballot papers, they are effectively 'live'. Regardless of whether you have outsourced your printing or are printing in-house, in order to ensure that voters can have confidence in the process, you should ensure the security of ballot papers during production and storage. 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.



To be able to achieve the outcome set out in [performance standard 1](#), you will need to maintain the secure storage of ballot papers at all times. To demonstrate that the outcome can be delivered, you will need to have in place arrangements for securely storing ballot papers that prevent unauthorised access to or use of the ballot papers during all stages of the production process and storage between printing and the poll.

# 3 Polling station voting

3.1 We have produced a [polling station handbook](#) which covers in detail the voting procedures and what to expect on polling day.

3.2 The guidance contained in the polling station handbook has not been reproduced here. Instead, this part of our guidance focuses on the preparations you will need to make in advance of polling day.

## Setting up polling stations



Guidance on the identification of suitable polling stations can be found in [Part B: Planning and Organisation](#).

3.3 You should take all necessary steps to ensure that polling stations are laid out with the voter in mind. In particular, the needs of voters with a range of disabilities should be taken into account. The positioning of all of the required furniture and equipment, as well as where all of the notices should be displayed, should also be considered, along with the placement of signage within the polling station and external signage.

3.4 You should develop plans for the layout of each of your polling stations which can be used to assist those setting up the polling stations. You should consider voter throughput and flow, including how the voter will move through the voting process from entering to exiting the polling station.

3.5 Whoever is in charge of setting up polling stations should be instructed on how to do so and what the layout should be capable of achieving.

3.6 If polling station staff are not expected to set up polling stations, they should be instructed to check that the polling station has been set up properly, and should have reference to any layout plans you have produced and the polling station set-up checklist in the Commission's [polling station handbook](#) when doing so. The polling station handbook also covers the positioning of equipment and display of notices, and provides examples of layouts for both a room where there is one polling station and a room where there is more than one polling station.



To be able to achieve the outcome set out in [performance standard 1](#), you will need to ensure access needs are taken into account when planning for and setting up polling stations and that 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 have made an assessment regarding access needs, identifying

any problems and actions taken to remedy these, and provide guidance/training to polling station staff.



Further guidance on training polling station staff can be found in [Part B: Planning and Organisation](#).

3.7 Polling station inspector visits can be used to check polling station set-up and to ensure that all notices remain properly displayed throughout polling day.



Further details on the role of polling station inspectors can be found in [Part B: Planning and Organisation](#).

## Polling station equipment and materials

3.8 You are required to provide polling stations with certain materials:

- ballot box(es)
- ballot papers (including tendered ballot papers)
- materials to enable voters to mark their ballot papers (in practice, pencils - you may wish to provide a string to attach pencils to the polling booths)
- relevant part of the register
- absent voters lists – postal voters', proxy voters' and postal proxies lists
- form to record the details of electors who have been issued ballot papers after the correction of a clerical error (which may be appended to the polling station register)
- corresponding number list
- large-print version of the ballot paper
- enlarged hand-held sample copy of the ballot paper
- voting device for use by blind or partially sighted voters
- ballot paper accounts
- declaration by companions of voters with disabilities
- list of tendered votes
- list of votes marked by the Presiding Officer
- statement of number of votes marked by the Presiding Officer
- list of voters with disabilities assisted by companions
- Guidance for voters notice
- Instructions for voters notice (to be displayed inside the polling booth)
- polling screens
- packets, with seals, in which to place the items to be returned to you, such as postal ballot papers returned to the polling station, and for packaging the election documentation at close of poll

3.9 In addition, you should provide:

- a copy of the requirements as to secrecy
- envelopes, with seals, in which to place any ballot papers that have been issued but which the elector has not placed in the ballot box
- form or list to record electors marked as postal voters but who claim not to have applied for one
- notepaper for use by polling station staff
- stationery items as required, e.g. paper clips, drawing pins, adhesive tack, adhesive tape
- plastic sacks for returning stationery and equipment to the verification venue
- envelopes for making up assorted packets

3.10 You should check that all polling station equipment is fit for purpose and that you have a sufficient quantity. You should have prepared your polling station equipment and materials in good time before polling day, for either delivery to polling stations or collection by Presiding Officers.

3.11 As part of your evaluation of the suitability of your polling stations you will already have considered accessibility issues both inside and outside of each of your polling stations. You should ensure that any additional equipment you have identified as required to make the polling station accessible is delivered and set up in good time for the opening of the poll.

3.12 Where a polling station has an induction loop installed, it should be used wherever possible to support the accessibility of the electoral process to voters with hearing loss. Polling station staff would need to be trained on how to use these at the briefing session.

3.13 You must provide a copy of the relevant secrecy requirements to all polling station staff. We have produced the relevant secrecy requirements in [English](#) and [Welsh](#) for counting areas in Wales.

## Allocation of ballot papers

3.14 You must, subject to any advice or direction given by the RRO, provide each polling station with such number of ballot papers as, in your opinion, may be necessary. If you are not allocating ballot papers for 100% of electors entitled to vote in person at the polling stations careful consideration needs to be given to the number that will be required in each case.

3.15 As part of your consideration, you should consider expected turnout levels. In such a case, as a minimum you should assume that the turnout will be **not less** than the turnout at the last equivalent poll.

3.16 If you decide for any reason not to allocate ballot papers to polling stations based on 100% turnout of eligible electorate, you should have plans in place to ensure that additional ballot papers can be provided to any polling station that may require them in a timely manner and give clear advice to

Presiding Officers about how to complete the ballot paper accounts to take account of the additional allocation.

3.17 When allocating ballot papers to polling stations, ensure that the numbers on the ballot papers allocated to each polling station run consecutively in order to avoid any problems with completing the corresponding number list or ballot paper account. Further guidance on the printing of ballot papers is provided in **Production of notices, poll cards and ballot papers** above.

3.18 Tendered ballot papers must also be supplied to Presiding Officers. Tendered ballot papers should be supplied to polling stations in a sealed envelope with instructions stating that the envelope should be opened and the ballot papers within it issued only in prescribed circumstances, and a brief description of those circumstances should also be provided. This can help to avoid tendered ballot papers being issued in error.

3.19 You should take all necessary steps to ensure that all polling station staff understand that there are limited circumstances in which tendered ballot papers can be issued, and are made aware of what these circumstances are and what processes they will be required to follow for issuing them. The circumstances under which tendered ballot papers can be issued and the processes for doing so are covered in the Commission's [polling station handbook](#).



Further guidance on training polling station staff can be found in [Part B: Planning and Organisation](#).

## Polling station registers and absent voting lists

3.20 You must provide each Presiding Officer with the appropriate part of the register for their polling station and appropriate absent voting lists. Polling station registers can be printed once the final election notice of alteration has been published, five working days before polling day. (Thursday 16 May 2019).

3.21 Polling station staff should have been trained on the various franchise markers that will appear on the register. Be aware of the security of voter's personal details on the electoral register and poll cards. Ensure any poll cards left by voters at the station are destroyed in line with your document retention policy.

3.22 Polling station registers can be printed once the final election notice of alteration has been published, five working days before polling day. You should ensure that all printed polling station registers are checked to ensure that they are complete, reflect any recent additions or deletions to the register, and that the appropriate franchise markers are in place. You should also

instruct your Presiding Officers to check that they have been provided with the correct register for their polling station and that it includes the expected number of electors allocated to their polling station.

**3.23** Procedures should be put in place to deal with any necessary amendments to polling station registers and proxy lists notified by the ERO after that time resulting from alterations as a result of correcting clerical errors or court decisions on registration appeals and the granting of emergency proxy applications.

**3.24** Whether such determinations are made before polling day or on polling day itself, if you are not also the ERO, you should agree with them a method for communicating the relevant information to Presiding Officers, which may be done orally or in writing.

**3.25** Where a clerical error has been rectified and the relevant elector arrives at the polling station and applies for a ballot paper, the Presiding Officer must issue a ballot paper in the usual manner. The Presiding Officer must also make a written record of the elector to whom a ballot paper has been issued following an alteration to the register due to a clerical error. This record should include the elector's name and elector number. To assist Presiding Officers, you should attach an additional sheet to the polling station registers to allow them to record any such amendments.

**3.26** Similar processes should also be developed to communicate additions to the proxy voters' list as a result of emergency proxy applications.

**3.27** Where a person makes a complaint to polling station staff that suggests that they should be on the electoral register, the Presiding Officer must communicate that representation to the ERO as soon as is practicable. For this to work effectively there will need to be suitable communication systems in place between Presiding Officers and the ERO.

## Corresponding number lists

**3.28** There are two types of corresponding number list: one list, which is the list to be used at postal vote issuing sessions, contains the number and unique identifying mark of every ballot paper produced, as well as the elector numbers of postal voters; and another list, which is the one to be used in polling stations, contains the ballot paper numbers and a column to add the elector numbers of voters to whom those ballot papers are issued.

**3.29** You must prepare and provide a corresponding number list for each polling station. The corresponding number list is a prescribed document that can be found in the appendix to the election rules.

# Packets for postal ballot papers delivered to polling stations

3.30 Postal voters can return their postal vote by hand to any polling station in the counting area.



Polling station staff should be appropriately briefed to identify which postal votes can be returned to their polling station. Further details on the training of polling station staff can be found in [Part B: Planning and Organisation](#)..

3.31 You should provide polling stations with packets for received postal votes. The number and style of packets should be based on returns at the last equivalent poll. Records of all such packets should be kept so that each one can be accounted for. The packets should be clearly labelled as containing postal votes. The labels should include the name of the polling station and polling station identifier. You should ensure that the packets are capable of being securely sealed. Polling agents are entitled to attach their seal to sealed packets before they are removed from the polling station and must therefore be permitted to do so.

3.32 You should emphasise to Presiding Officers the importance of maintaining the security of postal votes returned to polling stations by instructing them to immediately place any returned postal votes in the packets provided and to ensure that the packets are stored securely throughout the day.

3.33 You should arrange for postal votes to be collected from polling stations throughout the day as this will help to reduce the number that will have to be dealt with after the close of poll. Polling station inspectors can perform this duty. You should ensure that processes are in place to maintain a clear audit trail and to ensure the security of collected postal vote packets while in transit.

## Polling station log

3.34 You should prepare a polling station log for polling station staff to use to record any problems or anomalies. In particular, polling station staff should be advised to use this log to record anything that may help to explain any apparent issues with the ballot paper account at the verification – for example, if a voter has been seen leaving the polling station with a ballot paper.

3.35 You should also instruct polling station staff to record in the polling station log, any instances where they are required to ask the prescribed questions as a result of suspected personation. This should be done once the person in question has left the polling station. They should record as much information as possible, for example, any distinguishing characteristics, which

may help any future investigation. Appendix 7 of the [polling station handbook](#) sets out the procedure for dealing with personation, which involves asking the prescribed questions.

3.36 If you are concerned that personation may have taken place at a polling station you should contact your SPOC and you can also contact your [local Commission team](#) for additional support.

## Polling station notices

3.37 You are required to produce the ‘Guidance for voters’ notice (entitled ‘How to vote at this election’) and the ‘Instructions for voters’ notice. The contents and display of these notices are prescribed in legislation.

3.38 The ‘Guidance for voters’ notice is required by law to be printed in conspicuous characters and exhibited inside and outside of the polling station. The ‘Instructions for voters’ notice is required by law to be exhibited in every polling booth.

## Use of English or Welsh in polling stations

3.39 You should ensure that when you brief polling station staff, you make clear that, in polling stations, only English (or in Wales, English or Welsh) should be used when assisting or giving instructions to electors. This will ensure transparency in proceedings, and will enable any observers or polling agents present in the polling station to monitor the voting process.

3.40 Some voters may need assistance in another language because of their limited English (or English or Welsh) language skills. You should therefore carefully consider what support you are able to provide to voters in your area who may have limited English (or English or Welsh) language skills, in particular by providing translations of the polling station notices. In some exceptional cases the translated notices may not be sufficient or appropriate. For example, a voter may have low levels of literacy or may have a question that falls outside of what is covered by the notices. In those circumstances, if polling station staff are able to provide information in a language spoken by the voter, assistance in a language other than English or Welsh may then be provided. Where assistance is given in another language, polling station staff should explain to other staff and any polling agents or observers present what question has been asked and the response given.

## ‘Selfies’ in polling stations

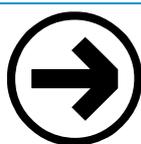
3.41 The law relating to obtaining information in polling stations and disclosing such information is complex. Given the risk that someone taking a photo inside

a polling station may be in breach of the law, whether intentionally or not, our advice is that you should not allow photos to be taken inside polling stations.

3.42 You should ensure that all polling station staff are aware of this guidance. You might also want to consider displaying a notice inside polling stations to make clear that photography of any kind (including photos taken on mobile phones) is not permitted. You may also want to consider whether you will allow the use of mobile phones at polling stations and whether to have signs explicitly prohibiting the use of mobile phones inside polling stations.

## Provision of information on the number of ballot papers issued

3.43 An election agent or polling agent might ask polling station staff for information on the number of ballot papers issued. It is for you to decide whether to release this information. A request for the number of ballot papers that have been issued can only be made by those who are entitled to be inside the polling station. If you decide to provide this information, you must be careful not to release any information that may risk breaching the secrecy of the ballot.



For the referendum on the UK's membership of the European Union, we produced a [summary sheet](#) on providing information on the number of ballot papers issued in the polling station, which you may find helpful.

## Close of poll

3.44 Voters who at 10pm are in their polling station or in a queue outside their polling station for the purpose of voting may apply for ballot paper(s).

3.45 Good planning and flexible staffing should minimise the risk of there being queues at polling stations. As part of your planning you should consider where queues may arise and ensure that you have arrangements in place to be able to respond in the event of queues developing. You should ensure that polling station staff are monitoring turnout throughout the day and providing progress reports to polling station inspectors, and that you are kept informed if there is any intelligence that indicates a risk of there being a queue at close of poll at any polling station. However, you still need to be prepared to deal with any queues should they arise. You should also consider involving your police SPOC in planning arrangements to deal with possible queues at the close of poll, so they can assist you with queue management if necessary.



Further guidance on staffing arrangements at polling stations and relevant training of staff so they can carry out each other's roles in as far as the law permits can be found in Part B – Planning and organisation.

3.46 The Commission's relevant polling station handbook sets out in detail the processes to be followed at the close of poll, including how to deal with voters held in a queue at 10pm.