

Planning for the Elections Act changes: early preparations

Updates to this document

Updated	Description of change
5 October 2022	<p>Updates to:</p> <ul style="list-style-type: none"> • References to Voter Authority Certificate instead of electoral identity document throughout • Plans for publication of Commission guidance for EROs and Ros • Funding information provided by DLUHC • Training text and communications text • Information on the consultation on draft guidance for ROs: Assistance with voting for disabled people
18 November 2022	<ul style="list-style-type: none"> • Information on the Commission's guidance on Voter Authority Certificates and Anonymous Elector Documents on page 2 • Updated local authority corporate planning text on page 3 • Updated staffing requirements and link to updated Polling Station staff ratios guidance on pages 5 - 6 • Updated training text on pages 6 - 8 • Updated venues and equipment text on pages 8 - 9 • Additional information on communications and the Commission's voter ID campaign on pages 10 - 11 • Updated working with suppliers text on pages 12 - 13

Background

The Elections Act (the Act), which received Royal Assent in April 2022, makes a range of changes which will impact on electoral administrators, campaigners and voters. These will apply at the following election types:

- UK parliamentary elections in Great Britain
- Local elections in England – including mayoral elections
- Police and Crime Commissioner elections in England and Wales

The following provisions in the Elections Act 2022 are expected to be in place for the May 2023 polls:

- Making it easier for disabled people to vote
 - Disabled voters can choose anyone who is over 18 to accompany them in the polling station, to help them to vote
 - Requirement for ROs to take all reasonable steps to provide equipment to support disabled voters to vote independently and in secret at the polling station, and in doing so to have regard to any relevant guidance issued by the Electoral Commission
- Requirement for voters at polling stations to show photographic identification before they receive their ballot paper. Anyone who does not have one of the required forms of photographic identification will be able to apply for a Voter Authority Certificate, to be issued free of charge by their local ERO
- Change to the voting system for mayoral elections from supplementary vote to First Past the Post

To support you in preparing for and delivering the new measures we will be publishing new and updated core guidance for ROs, EROs and candidates and agents. We will also update key resources such as the polling station handbook, polling station staff training slides, candidates and agents briefing slides and FAQs for frontline staff. We will work closely with the electoral community to inform the development of the guidance and resources to help ensure they meet the needs of administrators.

We are taking a phased approach to the provision of the guidance, focussing on getting you what you need as swiftly as possible and in the order that you will need it.

Whilst the detail relating to the implementation of some of the measures in the Act is still to be confirmed, the [draft secondary legislation](#) which sets out the measures for voter identification has now been laid in the UK Parliament.

These regulations will require electors to provide photographic ID in order to vote in person at the polling station at certain polls and to sign recall petitions at a signing place from May 2023 and also introduce the application process for ERO produced Voter Authority Certificates and Anonymous Elector's Documents for electors who do not have an accepted form of voter ID to use at the polling station.

The application process will commence from January 2023, and we have published our initial core guidance for EROs for [England](#), [Scotland](#) and [Wales](#) to support the delivery of the new process.

We are working on further guidance on the application of the measures – especially in relation to RO planning, accessibility measures and the delivery of polling station processes – and will update you on our plans for this through the EA Bulletin as usual. We expect the Polling Station Handbook to be published to our usual timeframes in advance of scheduled polls, in February 2023.

Purpose

Whilst our work on the wider guidance continues, the aim of this resource is to highlight those aspects that you can start considering and planning for now. This resource will be updated as needed when clarity as to the detail emerges and we will highlight when any changes are made through the EA Bulletin and the change log above.

Whilst many areas do not have scheduled polls in May 2023, the guidance can still support you in making early preparations so you are ready for the first polls – scheduled or unscheduled – at which these new provisions will apply in your area. It will also support you in your preparations for the Voter Authority Certificate application process.

This guidance has been informed by consultation with the Elections, Registration and Referendums Working Group (ERRWG), the Society of Local Authority Chief Executives (SOLACE), UK Government, the Association of Electoral Administrators (AEA), the Electoral Management Board for Scotland (EMB), the Scottish Assessors Association (SAA), the Wales Electoral Coordination Board (WECB) and the Wales Electoral Practitioners Working Group (WEPWG).

Some funding information for the new measures has been made available by DLUHC. You will find references to this where relevant in the various sections of this guidance.

This information covers New Burdens Funding only for the tranche 1 provisions which will be available via a grant, JLB or hybrid system of the two depending on the policy. Initial details of the policy requirements, timings of payment, and duration for which this funding will apply will be available from DLUHC and will be sent to all local authority Finance Directors.

Any questions on funding should be directed to DLUHC.

Local Authority corporate planning

To support your delivery of the new measures, you will need to ensure that the changes introduced by the Elections Act are not only factored into electoral team planning and risk registers, but the implications and impacts are considered as part of wider corporate plans and risk management too.

As part of this, you should ensure that you discuss the impact of the new voter ID measures with your local police SPOC.

Corporate and team level plans and risk assessments should be reviewed regularly to ensure their continuing appropriateness as more legislative detail becomes available.

Ensuring corporate understanding of the changes and additional costs associated with them will also be important to ensure that the necessary resources are made available across your local authority.

Staffing

The new processes introduced as a result of the Act will create additional duties to be carried out both in preparation for and in the delivery of the polls. While we recognise it is challenging to estimate exact resourcing requirements without knowing the detail of the new measures, you should start thinking now about how you will identify your needs for both core and temporary staff and be able to move swiftly to fulfil them in good time, particularly as the period between the detail becoming clear and implementation may be short.

As was the case with the introduction of Individual Electoral Registration (IER), DLUHC have confirmed that New Burdens funding will be provided where appropriate to cover the additional costs resulting from the changes, including the additional processes required by the administration of the Voter Authority Certificate. This will be based upon the additional staff time needed to process online or paper applications.

DLUHC have also confirmed that funding will be provided for one temporary contact centre staff member for the first two years of implementation to cover the two months ahead of polling day when enquiries are expected to be highest. As this is seen as an ERO cost, this will be funded via new burdens only.

Additionally, DLUHC have confirmed that funding will be provided for one additional poll clerk per polling station for year 1 (2023/24) and year 2 (2024/25) and in every UKPGE year, and that funding will be provided for the additional time that will be needed to set up accessibility related equipment. This has been costed at an additional 10 minutes set up time.

How will you:

Ensure you have sufficient core staff resource?

Some of the new areas of activity that your core team, with support from other teams across the council, will need to deliver include:

- Additional planning, communication and work with disability groups - as well as the identification and procurement of equipment - to support making the voting process accessible for different groups of voters
- Additional administration relating to the Voter Authority Certificate:
 - You should anticipate that you will receive enquiries from voters once the application process goes live, even if you have no scheduled polls for May 2023. These queries will relate to both:
 - the requirement for voter identification in polling stations
 - the application process for the ERO issued Voter Authority Certificate

- Will you centralise enquiry management to your council contact centre to support core staff with focussing on administration? When would you plan for this arrangement to commence and what is needed to set it up?
- How will you manage requests for, or receipt of, paper applications for Voter Authority Certificates?
- What support might you need to manage the processing of additional emergency proxy applications relating to identification and the issuing of any temporary Voter Authority Certificates – particularly on or immediately prior to polling day?
- Planning for local communications activity, updating your communications plan, and managing any increase in enquiries throughout the year from voters, elected representatives and parties, and additionally from candidates and agents during an election
- Planning for sufficient core/senior staff in the elections office who are trained to handle escalated queries and complaints relating to voter identification requirements and the application process for Voter Authority Certificates and Anonymous Elector's Documents
- Planning for recruiting additional temporary staff, particularly polling station staff but also potentially additional election office staff, contact centre staff, and polling station inspectors to support effective implementation of the new provisions

To support you in determining and sourcing the core staff you need you should:

- Work with HR at an early stage in your planning to develop a recruitment strategy so you can source the staff you need and have sufficient time for staff training and allowing for any delays in recruits taking up their roles
- Identify other key staff that you will need to work with, for example accessibility experts, communication teams and contact centre staff. It is helpful to take a whole council approach to running elections and electoral registration, utilising expertise from other areas. You will need to ensure that relevant colleagues are made aware early of how and when you will need support throughout the implementation of the new provisions, which will allow them to plan for any associated impact on their own resources
- When determining what staff you need, and making plans for how you will recruit them, you should also think about any support you will need from ICT and facilities colleagues to ensure that you will have the necessary infrastructure to support additional staff

Ensure you have sufficient temporary polling station staff to deliver the poll(s)?

For the purposes of your planning, you should assume that you will need to appoint additional staff in polling stations as a result of the changes that will come into effect from the May 2023 elections. For example, it is expected that you will need your staff to:

- explain the new processes to voters and answer any questions they may have
- check each voter's photographic identification document before issuing a ballot paper
- support private photographic identification document checks on request
- keep new records in relation to photographic voter identification

- understand and facilitate the use of any additional equipment or support being provided at the polling station to assist with voting for people with disabilities

The Commission recommends ratios to support your decisions in allocating electors and staff to polling stations. In light of the additional requirements on polling station staff we have undertaken conversations with the Electoral Coordination and Advisory Board (ECAB) staffing sub-group - established to look at the challenges faced in relation to staffing resilience and capacity – to discuss the allocation of staff and electors to polling stations given the new requirements. We have also engaged with ERRWG and consulted with them on the updated guidance and ratios. This is now reflected in the [guidance for ROs](#) for the scheduled elections in May 2023.

If you haven't already, you should begin to identify any polling stations which exceed the new maximum recommended numbers of electors and consider what options you might have for splitting or managing those differently, to help accommodate the new additional procedures once they are in force.

- In addition, to ensure you are as well placed as possible to be able to recruit the temporary staff you will need if you have scheduled elections in May 2023, you should make early contact with the people on your database of election staff to ascertain their availability
- We are aware that recruitment of temporary staff has been challenging for some ROs at recent polls. To help you to manage your temporary staffing requirements, if you're not already doing so, you could also:
 - talk to your HR department to discuss how they might be able to support you with developing and implementing your recruitment plans
 - identify opportunities to expand your recruitment pool by contacting recruitment agencies, reaching out to local student populations or organisations, or making use of social media channels and council internal and external websites
 - talk to your RO and other departmental managers within your local authority to see if they can identify and provide resource to act as temporary staff for specific parts of the electoral process

Plan your training provision?

As part of your planning, you will need to update your training plans to reflect the new processes that staff will need to carry out. You should identify everyone who will be involved, whether in the delivery of the election or in the processing of applications for the Voter Authority Certificate and consider what additional training they will need. This should cover both existing and new/temporary members of the team.

For example, now that we know that the ERO Portal will be launched in January 2023 it is important that training for both core and any frontline contact centre or reception staff, who may need to assist electors in the completion of applications, takes place in advance of this date.

You also need to ensure that, for any by-elections taking place prior to 4 May 2023, your polling station staff understand that the new voter ID provisions are not yet in force and can explain to electors who may try to present ID that the provisions do not apply for that poll.

Additionally, core team staff will need training to deliver new processes including:

- how the Voter Authority Certificate and Anonymous Elector's Document application process works online and via paper applications
- how to determine applications in the ERO Portal and how the exceptions and attestation processes will work
- how the production and provision of Voter Authority Certificates and Anonymous Elector's Documents will work
- how to support any elector who may require assistance with completing their application, and how any in-person applications will work in practice

Core staff, frontline staff such as contact centre staff and council reception staff, and wider communications teams will need early training to understand and be able to explain to voters:

- what the introduction of photographic voter identification in polling stations means for them, including acceptable forms of identification, what the process will be if someone does not have identification, applying for a Voter Authority Certificate, and how the process for checking photographic identification will work in polling stations
- what measures are being taken to ensure that voting is accessible for all and how voters can access additional support where required
- the greater flexibility for disabled voters over who can act as their companion in the polling station

DLUHC have confirmed that funding for the training of core staff will be available. This is on the basis that one day of training will be required to cover all tranche 1 provisions.

Polling station staff will need to understand how to manage the changes in the polling station such as:

- the requirements for provision of photographic identification when voting, including accepted forms of identification, the checking process and what to do if a voter doesn't have or refuses to provide identification
- any record-keeping requirements as a result of the new measures
- what equipment to support disabled voters will be made available at polling stations and how to use it
- who can be a companion for a disabled voter

DLUHC have confirmed that funding for training on the new provisions for polling station staff will be available. This will be provided on the basis of an additional 10 minutes for the accessibility provisions and 30 minutes for voter ID.

Once the specifics of the measures are finalised, we will provide you with the detail of what you will need to cover in training in our updated core guidance and in resources such as briefing templates for polling station staff and for candidates and agents. We will also issue updated FAQs for your frontline staff and in the updated polling station handbook for polling station staff.

In the meantime, you can also start to think about how you will deliver your training:

- You may need to train a greater number of people than usual to meet your staffing requirements, which could mean you need larger venues and/or more sessions. This should be reflected in your training plans.
- You will be delivering training on a number of complex new election processes. Think about the timing and format of training sessions. For example, you could deliver face to face general awareness training much earlier than normal in the run up to the poll while consolidating the changes through e-learning solutions and additional sessions, which could also address any FAQs highlighted through your training programme.
- You will need to think about how you can provide accessibility awareness training for all staff who interact with voters, including staff who support electoral services as well core staff and those working in polling stations, to help improve their understanding of the needs of disabled voters and the importance of clear communication.
- Using e-learning solutions could allow you to deliver training to a greater number of people and removes the need to allocate your time or book training venues that might be needed for other electoral processes. E-learning may also allow polling station staff to repeat the training closer to polling day to refresh their learning and could be complemented with Q&A sessions to answer any questions arising. You should assess the quality of any off-the-shelf e-learning packages carefully to ensure that they cover all the legislative requirements and any specific local training needs.
- You could also provide online or printed reference tools for staff. It is important to review the briefing materials and resources you already have available and plan for which of these will need to be updated once detail is known.
- Elected members and candidates and agents will need to be informed about the changes introduced by the Elections Act. You should think about how you will communicate these changes and consider how to utilise briefings, information packs and other opportunities such as council meetings to support this. You could start with general awareness raising of the provisions, followed by more detailed briefings once you have developed your plans for implementation.

Venues and equipment

You will need to make decisions about which polling station venues you will use based on your usual criteria – including accessibility, location and capacity - as well as consideration of the requirements of the changes brought in by the Act.

Whilst the specific process to be followed in polling stations is yet to be confirmed, you should plan for the likelihood that voters may take more time to progress through the voting process because of the changes expected to come into effect for May 2023 - the requirement to present photographic identification and the impact of new accessibility provisions.

You will need to consider whether the size of each venue is sufficient to provide a good service for voters, ensure the secrecy of the ballot, provide necessary private areas for photographic identification checks, accommodate the number of staff required and reduce the risk of congestion and queues.

You will need to consider where you will offer support to electors with their applications for Voter Authority Certificates, and the management of temporary Voter Authority Certificates. This will need to be accessible for electors with space and suitable backdrop for photographs to be taken, including for people who require this to be done in private, and printing facilities.

You should also liaise with your IT department to ensure that any Voter Authority Certificate application documentation supplied by email, which could include large attachments (for example the elector's photograph), are not blocked by spam filters/ firewalls.

DLUHC have confirmed that each Local Authority will be able to purchase one camera and one printer-scanner for temporary Voter Authority Certificates if required. You may need to consider the additional storage you will need for any new equipment required by the provisions to deliver the polls. DLUHC have confirmed that the costs of additional storage space will be included within the new burdens funding.

How will you...?

- Review the suitability of existing polling stations and identify potential new venues?**
- You will need to review the suitability of your usual venues in light of the expected considerations relating to the checking of photographic identification. For example:
 - how you can design the flow of electors through the polling station to manage any congestion or queues effectively
 - whether the venue has a private space, or space to accommodate a screen, that can be used for checking the photographic identification of a person who wears a face covering or requests to have their photographic identification checked in private
 - how the implementation of any of the photographic voter identification requirements for polling stations will impact on the number of voters you allocate to a particular polling station
- If you decide to use additional or alternative venues in place of existing polling stations, this may involve carrying out an interim polling place review. We have produced [guidance on the reviews of polling districts and places](#), and you should follow the same processes for any interim review as you would for a compulsory review.
- It is important that you consider whether any polling place reviews will be needed as early in your planning process as possible to ensure you have sufficient time and resource to deliver the necessary steps involved in carrying out the reviews in time to support your preparation for the polls.
- As always, you will need to make sure that any alternative or new polling places have reasonable facilities for voting and are accessible. Any change of polling place should be communicated clearly and in a timely manner to electors, candidates and other stakeholders as needed.

□ Review the equipment to be provided to polling stations?

- As part of reviewing the suitability of your polling stations you should also assess what equipment will be needed.
- To support the management of the voter identification provisions, DLUHC have confirmed that funding will be available for one privacy screen and mirror per polling station.
- The purchase of equipment to ensure that polling stations are accessible is at the discretion of the RO. We have conducted an initial consultation on new guidance on assistance with voting for disabled people, which closed in October. The formal statutory consultation will open in December, but details of the initial consultation stage can be found on [our website](#) for reference. The final version of the guidance will be published in early 2023 once the statutory consultation period has been completed. The guidance will include a list of items that we consider should be available in all polling stations, such as additional seating for those less able to stand or assistive writing devices such as pencil grips.
- DLUHC have confirmed that funding will be available for the purchase of reasonable equipment to support disabled people to vote in elections. This will be based on the number of polling stations in the local authority area.
- DLUHC will be providing potential sources for the supply of goods and services with agreed prices that will be met by the New Burdens Funding. You may, however, procure your own.

Developing your communications plan and engagement strategy

By engaging with communications colleagues early you can begin to think about what new messaging you will need to plan to communicate, the timing of these messages and the different audiences you will be targeting. You could also consider any opportunities for collaborative working, such as by working with other nearby local authorities.

Alongside your usual messaging for elections, you need to plan to build in messaging about:

- the requirement for voters to produce valid forms of photographic identification to vote at the polling station
- how to apply for the Voter Authority Certificate if needed and the relevant deadlines
- the changes to who can assist voters in the polling station and promotion of any other information, support or equipment that will be in place to help voters with a range of additional needs to vote independently and in secret

The Commission will be publishing a suite of public awareness and information materials that local authorities will be able to use. This includes tailored communications for those who face additional barriers to using identification to vote, including:

- older people
- disabled people
- trans and non-binary people

- Gypsy, Roma and Traveller communities
- people experiencing homelessness and those living in refuges
- anonymous electors

Resources will include:

- A guide for public-facing staff and volunteers
- A leaflet for voters
- Posters, which will be printable on either an office printer or commercially
- Digital resources, including social media graphics and template newsletter and web copy
- Template press resources (including press releases)

All of our resources will be made available on our website and shared through our email newsletter Roll Call (you can [sign up here](#) if you aren't already registered) ahead of the launch of the Government's Voter Authority Certificate application portal in January. Once they're available, you might like to share these resources with teams at your local authority who work with one or more of these groups, such as sensory teams who can share this information directly with blind and partially-sighted people on their sight loss registers.

Ahead of the introduction of the requirement to show photographic identification to vote at the polling station, we will also carry out a wide-reaching public awareness campaign to ensure voters understand the change and to support continued participation in the electoral process. The campaign will raise awareness of the requirement to show photographic identification and remind the public to bring their identification with them when they vote. Our work will also help voters understand which forms of photographic identification can be used and support those without eligible identification to understand how and when they can apply for their free Voter Authority Certificate.

The paid advertising campaign will take place over two phases:

- Phase one (January – March 23): awareness phase running across England with the aim of making sure as many people as possible are aware of the change ahead of future elections.
- Phase two (March – May 23): urgency phase where we will be focussing activity specifically in election areas. Activity will include delivering timely reminders in the run up to and on polling day to actively remind people to bring their ID with them when they vote.

We will be sharing more information on our plans through Roll Call.

You should also begin your work to think about how you can make sure that voters with additional accessibility needs are aware of the new measures by identifying partner organisations and local charities and interest groups that represent those with additional needs. You can start to think about how you can work together to raise awareness of the support that you can offer to voters in polling stations.

To support you in your work to ensure that everyone can vote independently and confidently, we are producing updated guidance to help ROs and their teams to understand the barriers to voting faced by disabled people and make informed decisions on what they can do to help make voting accessible for all. We ran an initial consultation on this guidance

from 5 September to 17 October this year and will be launching our formal statutory consultation in December. We have provided details of the consultation and a link to the initial draft guidance on [our website](#) and will update you through the EA Bulletin once the formal consultation has begun.

Working with suppliers

You will need to think about how you will ensure that the suppliers you work with are able to support you in delivering the new requirements under the Act.

□ **Print suppliers - What can you do to prepare now?**

The amount of information that electors will need in advance of polling day about the requirement for voter identification and other changes relating to the Act means that the poll card may now need to be an enveloped A4 document rather than the traditional double-sided A5 form to include all the relevant information to be set out in legislation in an accessible way.

This change will likely impact:

- the form and type of products you procure from printers for poll card mail outs, including paper and envelopes
- the base text to be included, including information on voter identification and new accessibility measures
- the messaging to be included on any covering envelopes to inform electors that there is important election information enclosed; examples are provided below for your reference
- the timeframe for producing the printed material
- the despatch process, as letters will need to be enclosed in envelopes before handing over to mail delivery services

You should continue to ensure that all polling information you provide for electors in advance of polling day is provided in a user-friendly format, which is accessible for voters to read and understand and take any action they need to as a result. You should also think about what additional information you can include, beyond the prescribed text, to help support disabled voters understand what support is available to help ensure the accessibility of the voting process.

When thinking about the design of any poll card envelopes with your supplier, we recommend that:

- the envelopes should be clean with a simple strap line to inform electors that important election information is enclosed
- no poll card information – such as the elector number – is included on the covering envelope
- the envelope should be brown (if possible) and include the council logo on the front and the council's return address on the back

Some examples of messaging that you could include on the front of the envelope to draw attention to it and provide clear information to electors are:

- Important voting information enclosed
- Do not ignore
Important voting information enclosed
- Do not ignore
Poll card information inside

We are aware that the DLUHC-led suppliers groups are being engaged on the poll card requirements. You should have early conversations with your printers to ensure that:

- they can produce what you need in the timeframes required
- you have updated quotes for the work to inform your budget planning
- you agree how you will quality assure the process from design to print to despatch

DLUHC have confirmed that funding will be available to cover the difference in price between the production of the current A5 poll card and an A4 and enveloped one, as well as any differences in the delivery fee.

EMS suppliers – What can you do to prepare now?

The electoral management system software providers are currently working with DLUHC officials to ensure that the requirements of the new provisions are met and developed and tested appropriately. As part of this, system demonstrations and user acceptance testing have been requested from each EMS supplier.

Again, whilst specific detail of how the ERO portal will interact with EMS systems is not confirmed at this stage, there will be new processes within your EMS that your staff will need to understand and be trained to use. You should start to think about how you can plan for this training, especially as it may need to take place close to the application process go-live date, given the expected timing for the required secondary legislation to be made.