

# Key considerations for the delivery of the May 2021 polls: Absent voting

## Updates to this document

Updated	Description of change
9 February 2021	Amended to include advice on how to encourage the return of absent vote applications.
April 2021	Amended to update on the Commission's communications resources, expanded advice on the management of paper and updated wording on the introduction of emergency proxy provision on the grounds of coronavirus.

## Purpose

The coronavirus pandemic is continuing to impact how we live in Great Britain and will present particular challenges for Returning Officers (ROs), Electoral Registration Officers (EROs) and their teams in preparing for and delivering the 2021 polls. To support you, the Commission has issued supplementary guidance documents that focus on key parts of the electoral process. The documents can be accessed [from this page](#).

The purpose of this document, which has been developed in consultation with the SAA, EMB, and Scottish Government, as well as our national public health bodies, is to support you with the decisions you need to take to manage the particular challenges faced locally and nationally as a result of the current public health situation in relation to managing absent voting at the May 2021 polls. It should be read alongside our core guidance for electoral administrators and guidance issued by the EMB.

Guidance on managing applications for absent votes can be found in our core guidance for EROs on [absent voting](#). The management of absent voting, including the issuing and opening of postal votes, is covered in Part D of the [RO guidance](#).

This guidance is a living document in recognition of the changing landscape and ongoing developments in public health advice. Scottish Government has amended the deadline for absent voting applications and introduced legislation to extend the emergency proxy provisions to include reasons on grounds of coronavirus. These changes could have an impact on the management of the absent vote processes. We have updated this document to reflect this information.

There are general public health principles that everyone should follow in all aspects of daily life to help mitigate the risk of the spread of coronavirus:

1. Maintain physical distancing
2. Clean hands regularly
3. Avoid touching your face
4. Limit your number of contacts
5. Wear a face covering, where necessary
6. Self-isolate and get tested, where necessary

## Absent voting

### Communication

It is important that voters understand their voting options for the May 2021 polls. Polling stations will be safe places to vote but voters will also need to be made aware of their absent voting options including what they need to do to apply for an absent vote in time for the polls.

ROs and EROs will play a key role in communicating these important messages to voters, as well as encouraging those who do want an absent vote to apply early.

Due to the changing nature of the impact and response to coronavirus nationally and locally, it will be important that your communication plans are flexible and able to adapt to changing circumstances throughout the period leading up to the polls.

### How will you...?

#### **ÿ Communicate information about absent voting options to electors?**

- The Commission has produced a range of template communication resources to support you with raising awareness of the options people have about how to vote. Using these resources locally will help ensure consistent and clear messaging for voters, and help them to understand how they can participate in the May 2021 polls. The resources are available on our [democratic engagement webpages](#).
- The resources include an FAQ template which you should use to establish an FAQ page on your website to provide clear and current information to voters about the May 2021 polls. It will be important that you keep this up to date.
- It will be important to review and evaluate the success of your initial communications and then update your plan accordingly.
- ROs and EROs will need to think about how you can maximise opportunities to communicate your key messages locally, including through existing social media or other local authority communication channels and whether you will be able to add additional messaging about voting options to any other local planned written communications such as a [Household Notification Letter \(HNL\)](#), bearing in mind that there are restrictions on including the details of 14 and 15 year olds.

#### **ÿ Engage with political parties, candidates and other stakeholders?**

- It will be important to engage with candidates, agents, parties and campaigners to ensure that they are fully aware of your plans to promote awareness of voting options for the polls. This will help them to understand what to expect and allow them to reflect the key messages for electors in their own activity. As part of this engagement you should take the opportunity to remind them of the [Code of Conduct for campaigners](#) and in particular at this stage to draw their attention to what it says about absent voting.
- In order to mitigate the risk of general concerns about the integrity of the postal voting process, particularly where the levels of use may well be higher than at previous polls, your plans should set out mechanisms for monitoring indicators of possible electoral fraud and setting thresholds for action in response. Although there are no definitive signs of possible electoral fraud, you should be aware of and consider all the data which is available to you, including whether there have been unusual patterns in absent vote applications at previous elections. You should communicate and explain your approach to tackling fraud to provide reassurance to voters and campaigners, and should report any issues that are identified through your work to your police SPOC.
- You should also inform candidates, agents, parties and campaigners about any adaptations to your usual processes for managing absent voting in light of coronavirus, ensuring that all key stakeholders receive the same information in the interests of fairness and consistency. For example, you should provide information at an early stage about how you are adapting your postal vote opening sessions, including what measures you are taking to protect your staff and observers, and what attendees will be required to do to comply and expect to see.

### **ÿ Ensure your communication plans remain flexible?**

- You will need to remain alert to the evolving situation, nationally and locally, and adapt your communication plans accordingly. You should think about contingency plans for how you would manage specific situations, for example if the level of restrictions in your area change you will need to think about how this will affect your messaging and the communication channels that you use. You will also need to consider whether any targeted messages and approaches would be needed for specific audiences locally, for example to support clinically vulnerable electors or students. Should you be affected by additional local measures that impact upon your communications plans, please contact your [local Commission team](#), who will be happy to support you.

## **Absent vote applications**

### **How will you...?**

#### **ÿ Encourage the return of absent vote applications?**

- When posting application forms to electors who request them, you may wish to (but are not required to), include pre-paid return envelopes in order to encourage their timely return. You could also advise electors that they can return their signed

application form by attaching it to an email.

- You should make application forms available in a range of places, including making forms available to download from your website or by providing a link to the forms available on the [Commission's website](#). While electors may be encouraged to return downloaded or emailed applications by email, the inclusion of a FREEPOST address on your own application forms would also enable electors to return their application by post if they prefer.
- Although you must supply, free of charge, a reasonable quantity of absent vote application forms to political parties and others for use in connection with an election, you are not obliged to provide return envelopes. While recognising that there will be costs incurred in the provision of envelopes, you may wish to consider whether a business case can be made for this under the current circumstances, to help ensure that all those wanting an absent vote can apply for one.

## How will you...?

### ÿ Manage the processing of applications?

- It will be important for EROs to ensure they build in as much contingency to their resourcing plans as possible at an early stage to manage bigger peaks of activity and/or the unavailability of key staff to deliver the process.
- This should include ensuring that you have identified and trained as many staff as possible in the process of managing absent vote applications, and also that your procedures are clearly documented so that other staff can follow them if key staff become unavailable unexpectedly or at short notice, or if you need to increase further your capacity during peaks. You may need to liaise with other departments in your local authority to ensure that you have as many staff available as required as highlighted in our guidance to support [planning for the 2021 polls](#).
- You should ensure that you have contingency plans for the loss of access to any key equipment or systems at any stage, such as putting measures in place to be able to continue to process applications remotely if access to the office is restricted.
- You should ensure that staff employed to process applications take care to only be present if well, avoid touching their faces, regularly and frequently clean their hands and seek to minimise the number of people touching any single document
- You should also identify at an early stage whether any additional IT equipment, such as PCs, scanners and licences may be required and take steps to ensure that the necessary equipment can be sourced, installed and tested in good time. You should liaise with your EMS supplier and IT colleagues to ensure that you get the appropriate support in place in advance of expected peaks.

## Producing and issuing postal votes

## How will you...?

## ÿ Produce your postal vote stationery?

- As outlined in our supplementary guidance on [planning for the 2021 polls](#), ROs should have early discussions with their printer to check their capacity, and agree dates with EROs and printers for data transfer and printing.
- You should monitor the number of new postal vote applications you receive on a regular basis, and keep your print supplier informed of any significant increases that may impact upon your working estimates. You should also liaise with Royal Mail and provide them with up to date estimates of the number of absent votes you will be issuing.
- The design and production of postal packs should assist voters to complete and return their postal votes easily. The use of checklists and pictorial instructions can be helpful, especially where there may well be high numbers of electors using a postal vote for the first time, or a complex combination of polls. The Commission's [making your mark](#) guidance includes some good practice examples which can be used to help inform the design of postal packs.

## ÿ Manage the production of combined ballot packs?

- Where you are producing postal votes for more than one poll, you will need to think about a range of factors in deciding how best to manage the production and despatch of postal vote packs to electors including:
  - The number of polls taking place in your area and the capacity of your supplier to combine postal voting packs for electors,
  - How you can help to minimise the risk of voter confusion, especially in light of the likelihood of there being an increased number of postal voters who have not voted by post before (and who may, for example, be confused by receiving multiple packs
  - Whether you will split the packs along the lines of different voting systems. If you decide not to, or are unable to, issue all the ballot papers in one pack, it may be helpful to voters to split the packs.
  - How you will manage the impact of your approach on your resources – if you produce multiple packs for individual electors it may double or treble the amount of work required. For example, these will all need to be part of separate quality assurance checks before despatch and when returned will have an impact on the number of packs to open and the volume of postal voting statements to be scanned.

Further information on the management of postal ballot packs where polls are combined can be found in Part D of our [guidance for ROs](#)

- Where there are regional polls, you should discuss your absent vote arrangements with other ROs and the relevant RRO, as well as your print suppliers, for the purpose of consistency.

## ÿ Carry out checks of the production process?

- As outlined in our supplementary guidance on [planning for the 2021 polls](#), you should have early discussions with your print suppliers to explore the options for carrying out the necessary quality assurance checks on live printed material and postal ballot packs. This should include the identification of contingency

arrangements should your planned approach need to change (for example, as a result of any change to national or local restrictions).

- You should ensure that your quality assurance process is fully documented so that it can be undertaken by alternative members of staff should key staff become unavailable.
- If ROs issue your postal ballot packs in house rather than through a supplier you will need to ensure that you adapt your processes to follow public health guidelines regarding social distancing and the management of paper. This will also include ensuring you have adequate resources required to carry out quality assurance checks who are trained in managing the process in a COVID-secure way.
- If you have outsourced the printing of postal votes and need to carry out on-site checks, you should ensure that your staff follow public health guidelines including regular cleaning of hands, physical distancing, the avoidance of face touching and the wearing of face coverings as required as well as any other instructions that the print supplier provides. For example, your supplier may limit the number of staff attending from each local authority, and arrange for visits from different authorities to be staggered in line with an agreed timetable for visits.
- You should manage any of your staff who are undertaking in-person checks of material in 'cohorts' or fixed teams (assigning and keeping people to shift teams to limit social interaction as per [HSE guidance on working safely during the coronavirus outbreak](#)) wherever possible, for example, ensuring that they travel to the print supplier in their own car(s), and limiting their contact with other key staff on their return, or returning to work from home.
- If you are not satisfied that you can carry out onsite checks safely, you could consider having the postal votes despatched to your offices so that you can carry out the checks there before putting them into the mail system. You should ensure that any such process is able to be incorporated into your original timeframes to ensure that there is no delay in the delivery of postal ballot packs to voters. You could also discuss with your supplier whether and how they could facilitate checks being carried out using video conferencing or other technological solutions.
- Despite the challenges, it remains your responsibility to ensure that there are no errors in the printing, collation or despatch of voter materials. The Commission has produced a [proof-checking factsheet](#) to assist you with the quality assurance of the production of postal votes.

### **Deliver your postal votes?**

- If you hand deliver postal votes, you will need to ensure that you have sufficient staff to manage this. You will need to provide additional training to your staff, reminding them to maintain physical distancing, avoid person to person contact, clean their hands, and avoid touching their face. You should provide them with hand sanitiser, advising on its [correct](#) and regular use (for example, in between deliveries). Staff should be advised to carry a face covering for use in communal lobbies or reception areas where mailboxes may be situated, or in the event of situations where social distancing is impossible.



- You should have contingency arrangements in place should staff become unavailable at short notice to ensure there is no delay in dispatching postal votes to electors, including how you would manage the retrieval of any postal packs that may have already been allocated to staff for delivery.

## Reissuing lost and spoilt postal votes

### How will you...?

#### • Issue replacements safely?

- You should be prepared for a potential increase in the number of replacements you will need to issue, as well as the possibility that requests for home visits to re-issue packs will be greater than normal. You should put arrangements in place to ensure that electors who aren't able to attend your offices for a replacement can be assisted and that you have sufficient resources to manage this.
- Where there are cross boundary electoral areas, you will need to liaise with the other RO(s) to agree a process for issuing replacement postal votes. For example, deputies could be appointed in the other local authority area to issue replacements.
- If an elector is not able to attend your office to present their proof of identity, you will need to consider what measures you could put in place to ensure you are satisfied of their identity in order to be able to issue a replacement, such as by accepting a scanned or emailed copy of their identification instead.
- Where electors are able to collect a replacement postal pack from the elections office, you will need to put appropriate measures in place to ensure the safety of your staff and the public:
  - You should provide hand cleaning facilities at the entrance and exit of your offices and next to any desk where people may be holding or handing over paper documentation, and ask electors and your staff to maintain their distance (this may be facilitated by a physical barrier).and follow [guidelines on the wearing of face coverings](#)
  - To help manage this efficiently you should put in place markers that allow for physically distanced queues, and establish a one-way system for access to the office.
  - You could also try to implement an appointment system, to help avoid the risk of electors coming into contact with others, but you will need to ensure that electors remain able to collect replacement papers regardless of whether they have made or keep their appointments.
- If members of your core team are issuing replacements from your offices, you should try to minimise their contact with other people by keeping this group of staff in a specific 'cohort' or fixed team together if possible.
- You will need to provide additional training to staff undertaking visits to issue replacement packs to electors in person, reminding them to maintain physical distancing, minimise physical contact, and clean their hands before and after any contact. You may need to provide them with equipment such as cleaning wipes and hand sanitiser. As visiting staff may not be able to keep a safe distance from electors, you may need to ask them to wear face coverings, and you should continue to consult the [government guidance](#) on this for your area regularly and

especially in the run-up to and during the period in which replacements can be issued, to inform your approach.

## Postal vote opening sessions

### How will you...?

#### **ÿ Ensure your postal vote opening venue is suitable?**

- As outlined in our supplementary guidance on [planning for the 2021 polls](#), ROs should make an early assessment about the suitability of their venue, including ensuring the venue is well ventilated as per [HSE guidance](#) and able to allow physical distancing and identify any necessary adaptations.
- As part of their contingency planning, ROs should have arrangements in place to keep on top of the postal vote opening process if their venue becomes unavailable. For example, if a member of your opening staff develops coronavirus symptoms, you may need to arrange for the venue to be deep cleaned or left empty for a certain period, but you could continue to hold your postal vote sessions at an alternative venue as long as you give the necessary notice to candidates and agents. You may wish to advise candidates in advance what the alternative arrangements would be should a planned venue become unavailable at short notice to help manage expectations.

#### **ÿ Ensure you have the appropriate resources?**

- ROs should keep the number of postal votes they will be issuing under review, and take any steps needed to reflect any increase in their resourcing, including the number of postal vote opening staff and the accompanying scanning equipment.
- You will also need to ensure that the venue used for opening is large enough to allow for the processing of an increased number of postal ballot packs and the presence of observers, while enabling physical distancing. If you are unable to obtain additional resources or a large enough space, you may need to run more postal vote opening sessions to manage the volumes of postal votes.
- Our supplementary guidance on [planning for the 2021 polls](#) contains more information on staffing considerations for the management of specific events and venues. This includes thinking about any additional roles you may need for managing events in a COVID-19-secure way, the use of fixed teams to minimise the amount of staff who would need to isolate should a member of staff contract coronavirus, and the creation of reserve lists of staff who have been suitably trained to call on at short notice, in case staff drop out due to illness or the need to self-isolate.

#### **ÿ Manage your postal vote opening sessions?**

- ROs should continue to work with your local public health colleagues to ensure that your postal vote opening sessions are managed safely.
- Whatever measures you put in place for the safe management of the sessions, you will need to engage in advance with those entitled to attend to ensure that they are fully aware of how the process will be managed, and particularly how it may differ to any previous experiences they may have of the process. Clear explanation of the



rationale for your decisions will help all involved to have confidence in the process and will help with the smooth running of the sessions.

- You should ensure that all postal vote opening staff, as well as candidates and agents, are briefed about how you are adapting the postal vote opening sessions so that they are reassured that appropriate measures will be in place for their safety, and they know what to expect and how to behave. You should also remind staff, candidates and agents to be aware of the [symptoms of coronavirus](#). No-one should attend a postal vote opening session if they are unwell, symptomatic with COVID-19, a confirmed case or a confirmed contact of someone who is self-isolating.
- Scottish government has issued guidance on the [Test and Protect](#) system, which is mandatory in certain sectors. Although use of QR codes and the NHS COVID-19 app is not officially required for all venues, they provide an easy way to support public health efforts to manage the virus. Regardless of whether you decide to use QR codes and the app, you should ensure that you record the contact details of all those present at each opening session to maintain a clear audit trail of attendance wherever you have visitors on your premises for a sustained period of time, both for your own records and any requirements to support Test and Protect.
- ROs will need to consider the lay-out of your opening sessions, to encourage staff and observers to maintain physical distancing. For example, you could use floor tape to mark distancing requirements, and you should look to adopt a one-way system for moving in and out and around the room.
- If you are able to use a range of rooms for your postal vote opening sessions, you could allocate different electoral areas and/or separate staff teams, to different rooms, to reduce the number of observers and staff in each room at any given time.
- You could use partitions or barriers to separate people working at desks. However, you will need to bear in mind the duty to allow candidates and agents to oversee the proceedings and to object to rejected votes. Some ROs already utilise technology to project the adjudication of personal identifiers on large screens to help ensure everyone can see the process. This approach could help ensure the integrity of the process whilst keeping candidates and agents at a safe distance.
- You will need to ensure that the accommodation and facilities used are cleaned regularly, and that surfaces and equipment which are frequently touched are cleaned at regular intervals during the session.
- Everyone working with shared documents and papers should take great care to only be present if well, avoid touching their faces, regularly and frequently wash their hands and seek to minimise the number of people touching any single document.
- ROs will need to provide access to hand washing facilities and have hand sanitiser on each table, and encourage very regular cleaning of hands, for example by displaying notices which encourage observance of the public health guidelines. You should allow your staff regular breaks to wash their hands, and avoid them all going for breaks at the same time.
- Work teams should be kept small, so you may want to group staff in teams of no more than six, and should in any case keep members of each team physically distanced wherever possible. Grouping opening staff into pairs that work together each day could be helpful in further minimising contact with others. You should document the identities of people working in 'bubbles' and retain them for contract

tracing purposes

- In response to government guidelines and public health advice, you may need to require staff and observers to wear face coverings during postal vote opening sessions. You should consult the [latest government guidelines](#) on the wearing of face coverings which apply for your area.
- You may need to revisit your usual arrangements for the final opening session. For example, if you usually move this to your verification and count venue you will need to ensure that you have sufficient space to carry out opening at the venue, and that you have the necessary staff and equipment.
- You will also need to think about how you will incorporate the final sweep into your final opening session. Given the possibility of a higher than usual number of postal votes it is also possible that a greater number than usual will be returned on polling day, you will need to consider what impact this could have on the timings for the verification and count.

## Emergency proxies

The requirements for attestations for some emergency proxies have recently changed in Scotland local government elections (more information can be found in [Bulletin 267 – Scotland](#)). The Scottish Government has brought forward legislation to amend the application process for coronavirus related emergency proxies at Scottish Parliament elections, and our [guidance to ROs](#) has been updated accordingly.

**How will you...?**

### **ÿ Make sure voters understand the process and who is entitled to apply?**

- ROs and EROs should ensure that your communication plan includes how you will make electors aware that there is an emergency proxy facility that they can apply to use should their circumstances change in the immediate period before the poll and they are no longer able to vote in person, including due to coronavirus. Your messaging should include details of eligibility, how to apply and the deadlines involved, and inform electors of how they can find out more.
- You will need to think about how you can support your frontline staff in answering queries regarding the emergency proxy process effectively, including on technical matters such as eligibility and the application process, so that electors are provided with accurate and timely information. We have updated the version of our FAQs for frontline staff resource to assist you with this.

### **ÿ Manage the processing of applications?**

- As part of their planning, EROs should ensure they have contingency built in to resource the processing of emergency proxy applications. As the window for emergency proxy applications is short and includes polling day itself, you will have to balance the timely processing of applications against other competing demands. You will need to mitigate the risk of experienced staff not being available to manage this in the run up to the polls due to being otherwise engaged with other aspects of running the election, or the potential for an increase in volume of applications by identifying and training additional staff as

needed. You should ensure that you document your agreed processes for the management of emergency proxy applications to support this.

- EROs should also consider how they will deal with any applications which have not been completed properly. You should identify how you would follow up with any electors who have not correctly completed the application in order to try to address any errors or omissions in their application before the deadline. Whatever process you put in place, it should be appropriate to your local circumstances and applied consistently.

## **ÿ Communicate late proxy appointments**

- EROs, in discussion with ROs, should consider how they can schedule the printing of polling station registers and proxy vote lists to try to include as many emergency proxy appointments as possible, and you should review and update your processes to ensure that they are suitable for dealing with the likelihood of a greater number of emergency proxy appointments than usual..
- Where emergency proxy applications are granted after the polling station registers have been printed, EROs should take steps to add these applications to the polling station lists ahead of polling day. You could produce an addendum to the polling station list at the end of each day, for example, and add it to the main lists that you have already produced. However you intend to manage this, you should document your processes to ensure that you have a consistent approach and that no new records are missed.
- Where emergency proxy applications are received on polling day, ROs will need to ensure that these are communicated to polling staff promptly, for example by polling station inspectors, by phone or email. Given the potential for an increased number of emergency proxies and the potential for less experienced staff to be required to manage the process, it will be especially important that you document your processes so that you have a consistent approach that can be managed effectively even in the absence of key personnel.