

Key considerations for planning the delivery of May 2021 polls

Updates to this document

Updated	Description of change
6 November 2020	Amended to reflect updated advice from national public health bodies about mitigations when working with paper.

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.

The purpose of this document, which has been developed in close consultation with the EMB, SAA, Scottish Government, AEA and Cabinet Office, as well as our national public health bodies, is to support you with the decisions you may need to take to manage the particular challenges faced locally and nationally as a result of the current public health situation when planning for the May 2021 polls. It should be read alongside our [core guidance for electoral administrators](#).

It is not intended to be a comprehensive breakdown of what you should do, not least because the situation is evolving and circumstances will vary from area to area. Rather, it highlights some key considerations for you in preparing for the poll(s) against the backdrop of the coronavirus pandemic. This guidance is a living document and we expect to update it as and when we have further detail to add, or in response to changes in legislation.

Planning for the polls

You will have already started to plan for the poll(s), and it will be important to keep your plans under review and to re-visit and amend them periodically during the run up to the poll(s). It will be particularly important that you document and keep a clear audit trail of decision-making processes and reasoning as part of this.

This guidance focusses purely on your planning for the delivery of the polls - we have also issued specific [guidance on key parts of the electoral process](#) such as the management of nominations and absent voting arrangements, as well as on polling day and the verification and count.

Risk assessments

- Your planning will need to be informed by initial and ongoing risk assessments of your processes. Risk assessments will help to ensure that your plans continue to remain appropriate and will enable you to deliver the poll(s) in your area even as the public health situation and associated guidelines on physical distancing continue to evolve.
- The Scottish Government has published guidance on [risk assessments in the workplace](#). While this is not written specifically for electoral administrators, it offers some helpful guidance on how to carry out a coronavirus risk assessment of your processes and for your staff, and how to reduce risk to the lowest reasonably practicable level. This should assist you in determining the most appropriate way of keeping your staff and electors as safe as possible. It will also help you to identify mitigations if, for example, the process suggests that you would not be able to use your usual office spaces.
- The Scottish Government has also published guidance covering [managing visitors at events](#) and [general guidance for safer workplaces](#) which may also be useful in helping you to risk assess your approach locally to managing different elements of the process. Public Health Scotland also suggest referring to [guidance for public libraries](#) which has helpful information on creating a safe place for staff and members of the public.
- You should work with your election project management team, risk management experts and public health experts within your local authority and your wider local area to review your risk assessments and wider plans regularly, consider the success and continuing appropriateness of existing measures, identify any improvements and expose any gaps. Any mitigation measures you identify should be implemented immediately wherever possible.
- In line with your risk assessments, you should make contingency plans for the event that your access to the office remains or becomes restricted. You should liaise with your EMS supplier and IT services to ensure remote working capabilities and integration with the IER digital service are sufficient to enable you to manage the registration processes effectively.
- To help you with this important aspect of your planning, we have included some example risk assessment templates based on those provided by the [Electoral Management Board for Scotland](#) and [Pembrokeshire Council](#) at Appendix A which you might find helpful in determining your approach locally.
- Where you are managing a poll which involves cross boundaries, or involves coordination across an electoral area, you should discuss your risk assessment approach and plans with the relevant ROs and RRO, to ensure consistency of approach as far as is appropriate across the electoral area.

Staffing

Your approach to staffing should address actions and adjustments to enable your core team to operate effectively and be resilient to the challenges posed by the coronavirus pandemic, informed by your ongoing risk assessments. You will also need to plan for recruiting and working with temporary staff, including some you may not have used before.

Planning for core staffing

How will you...?

ÿ Ensure you have sufficient staff to deliver the poll(s)?

- You may not currently have the usual number of staff available in your core team – for example, staff may have been redeployed – but there may be some scope for them to be recalled to the team in recognition of the statutory requirement to deliver the poll(s). In any case, you will need to plan how you can best deploy your available staff resources in the run up to, and during, the election period.

ÿ Increase the resilience of your core team?

- You should strengthen the resilience of your core team as far as possible, so that you can manage peaks in work which may be higher than usual, as well as being prepared for the potential for members of your core team becoming unavailable.
- You should ensure that you formally appoint deputies to cover the role of the RO. You may appoint deputies with full or specific powers, and you will need to think about making different arrangements for different parts of the election process (such as nominations) to give yourself sufficient capacity.
- It may be prudent to train other staff to be on standby to replace or supplement members of the core team if necessary, to help ensure you have sufficient capacity at peak periods such as registration, absent voting and nomination deadlines. You should ensure that as many people as possible can manage these processes effectively in the event that members of your core team become unavailable.
- Given the possibility that staff who test positive for the virus or who are contacted by [Test and Protect](#) could, at short notice, prevent individuals or groups of staff from working from your offices or at all, you should ensure that all processes are fully documented so that duties can be transferred as seamlessly as possible. This will be particularly important where there are time-critical processes to be carried out or fixed deadlines, such as during nominations or the processing of registration of absent voting applications.
- Where possible, grouping your key staff into fixed teams or partnering to minimise contact can help to provide greater resilience against infection spreading throughout your core team and to minimise the risk of the loss of key

people due to self-isolation requirements. Your senior staff should be spread across different fixed teams to minimise the impact if one fixed team is affected.

- You should also revisit how your team works together in your usual office spaces; and may need to redesign use of office space as part of your risk mitigation. This should be part of your risk assessment checklist, with suitable contingencies planned in advance.

Planning for temporary staff

How will you...?

ÿ Determine what additional roles and staff are needed?

- You will need to identify your staffing requirements for the poll(s) – for postal vote sessions, polling stations, the count, and other support roles.
- Coronavirus considerations mean that you will likely need staff to perform functions that won't have been necessary at previous elections, as well as needing more staff than usual to carry out established functions. To help quantify these resourcing needs you could begin by identifying how you will incorporate physical distancing or other coronavirus -secure measures and whether additional staffing would be necessary to ensure safety and smooth-running.
- You should consider whether the recommended ratios for polling staff will be sufficient, bearing in mind that there may be adjustments to the polling station process to make the environment as safe as possible. For example, your polling staff may need to cover additional duties such as encouraging physical distancing. To ensure physical distancing can be maintained in some polling places, you may need to think about using more than one polling station which would consequently require employing more polling staff than usual.
- You should think about the number of postal vote and count staff you will need, bearing in mind that staff may be less able to work in pairs than usual. The number of staff you employ in traditional roles will depend on how many people the venue can accommodate with physical distancing and other relevant safety measures in place. Additional roles may be necessary, for example to manage the movement of staff and attendees within the venue.
- You may need to deploy additional staff to manage queues at venues, to undertake regular sanitisation of venues and equipment, and encourage electors and other attendees to maintain physical distancing.
- In addition, boosting your total number of staff to cover certain aspects of the poll will improve the team's overall resilience and flexibility. This could include having more staff available than usual as back-up, should you need them.

ÿ Source, recruit and organise temporary staff?

- Once you have a clear picture of your staffing needs you should make early contact with people on your database of election staff to ascertain their availability. You may find it more difficult than usual to recruit temporary election staff in the current circumstances and given the likelihood that you may require more staff than usual. You should liaise with your HR department to ensure they

are aware of your requirements and can provide you with the necessary expert support with recruitment. They may be able to assist you with recruiting from a wider pool than usual, for example by contacting agencies or reaching out to local student populations.

- You should also talk to senior officers within your local authority to see whether they can offer additional support in managing your requirements for temporary staff for specific parts of the electoral process.
- You should think about how you could organise your temporary staff differently under specific arrangements to manage risks of their not being available, or needing to work in smaller groups over additional sessions to carry out their functions.
 - For example, in relation to postal vote staff, the need for physical distancing may lead to fewer staff being able to work in venues at the same time, which may mean that the postal vote opening process needs to be carried out over an extended period. Assigning staff into 'shifts' could help manage this, with staff working a manageable amount of hours in one shift, while keeping the postal vote opening process moving.
 - Additionally arranging teams into fixed teams could reduce the risk of losing key staff where outbreaks occur or self-isolating is required.

ÿ Be prepared for staff drop outs?

- You may experience staff dropping out of election roles close to, or on, polling day, due to illness or the need to self-isolate, for example. You will need to emphasise to your staff the importance of communicating any inability to work clearly and in a timely manner. You should have a reserve list of staff who have been suitably trained to call on at short notice. You may wish to have reciprocal arrangements with neighbouring authorities for sharing lists of available staff in the event of one area being affected by drop outs more than others.

General staff considerations

How will you?

ÿ Create a safe environment for your staff?

You should ensure that everyone working with shared documents and papers take care to only be present if well, avoid touching their faces, regularly and frequently clean their hands. Staff should seek to minimise the number of people touching any single document where possible.

- You will need to provide training on the importance of physical distancing and how to clean hands. Public health bodies emphasise that hand washing is very important and staff should do this in some way after any contact with others outside their fixed team.
- You should provide your staff with additional equipment informed by your risk assessment. Once you have determined what is appropriate, you will need to identify how you will source and provide any necessary equipment. You should refer to the Scottish Government's [guidance on PPE](#) for employers to inform your approach to managing this.

- You may find it challenging to recruit or retain sufficient polling, postal vote and count staff because people are reluctant or unable to carry out the work due to health and safety concerns. You will need to plan for how you will mitigate this risk, working with health and safety experts within your local authority, and take steps to provide any practical support and reassurance that you can to those that carry out election roles.

ÿ Deal with enquiries from the public?

- You will need to ensure you are equipped to manage enquiries from the public, which may increase due to enquiries regarding how the poll(s) will be delivered in light of coronavirus. For example, if you usually outsource this activity and there is a shortage of call centre staff available through your usual providers as a result of the current situation, you will need to think about how you can adapt your plans to reflect this.
- If you use a call centre to handle your incoming calls, you should liaise with colleagues to ensure there will be sufficient staff available to manage call volumes, particularly during peak periods when you are sending out poll cards and postal votes. In this scenario, it will be important to prepare helpful answers to any anticipated coronavirus-related questions which are likely to arise on these processes so that non-specialist staff can handle queries confidently, consistently and appropriately. The Commission will be providing an updated FAQ resource to assist you with this in due course.

Training

As part of your planning you will need to identify what training you will need to provide to your staff and, importantly, how you will deliver this training for the May 2021 poll(s) in light of the current circumstances. We have provided you with the detail of what you need to cover in your training in the updated polling station handbook and briefing templates for polling station staff and for candidates and agents.

How will you...?

ÿ Deliver staff training

- Given physical distancing and other public health guidelines, delivering training in line with your usual approach may not be feasible or appropriate.
- As noted above, you may need to train a greater number of people than usual to meet all of your staffing requirements. You should therefore ensure you factor this likely increase of numbers into your training plans.
- Using e-learning solutions could allow you to carry out training remotely and help to ensure the continuity of training plans by mitigating any risk of sessions needing to be cancelled. This approach also minimises risk to your staff and trainers and removes issues relating to the management of training venues and the use of physical distancing and PPE. You should assess the quality of any off-

the shelf e-learning packages carefully to ensure that they cover all the legislative requirements and meet your specific training needs locally.

- If you instead plan to carry out some or all of your training in-person, you will need to think about delivering this as safely as possible, such as by limiting numbers at sessions and holding more of them, or by using larger venues to ensure distancing can be maintained between staff.
- If you decide to organise your core and temporary staff into fixed teams for risk management purposes, this will also have implications on how you deliver training to each fixed team that will need to be factored into your training plans.
- You should also ensure that you follow public health and government advice regarding the necessary hygiene and physical distancing measures that need to be in place in [workplaces](#) or when [holding events](#).

Venues

We have produced separate, more focussed guidance on considerations for the management of polling stations, postal vote opening sessions, and the verification and count. This guidance focusses on the fundamental principles you will need to think about when considering the overall suitability of venues for planning purposes.

Aided by the conclusions of your risk assessments, you will need to make decisions about which venues you will use for each stage of the process. Your choice of venue will be driven by the scale and type of interaction between people that will need to take place in each venue, and by local constraints on availability of alternative venues and other relevant local factors.

How will you...?

ÿ Identify and book venues for polling places, the count and other venues?

- You will need to review the suitability of all of your usual venues in light of the current circumstances and your additional requirements specific to these poll(s). Key factors to take into account in determining the suitability of each venue include:
 - whether venues are large and spacious enough to enable physical distancing to be maintained while carrying out the function the venue will be used for
 - whether venues can allow for physical distancing while remaining accessible to those who will be using it, including the required number of staff, voters and anyone else entitled to be present at specific venues and events
 - whether venues are sufficiently well-ventilated and whether you will be able to provide access to hand washing and/or sanitiser for all arriving at the venue and leaving the venue in line with public health advice and government guidelines on safety in workplaces/event venues
 - whether the venue has multiple entrances and exits, to enable you to implement a one-way system for navigating the room(s) if necessary
 - whether you would be able to help ensure physical distancing in queues outside of the venue where these are likely to occur
 - what cleaning protocols you and/or the building owner may have in place and whether these can be met without impact on the smooth-running of the

poll. Advice from public health experts is that usual household cleaning of venues will be sufficient in most cases. However, if a coronavirus case has been confirmed, more careful cleaning would be required, or alternatively, the venue could be left empty for three days, and then followed up with normal cleaning. The Health and Safety Executive have [additional guidance on cleaning practice](#)

- As part of this planning, you should also identify what measures can be put in place to ensure that physical distancing is maintained in your venues, for example by having clear markings on the floor to denote distancing requirements, and how you will establish a one-way system for walking through the venue if necessary.
- Your plans should also address your duty to allow designated individuals into venues for certain electoral processes. For example, candidates and agents must be allowed to oversee the proceedings in polling stations and be given the opportunity to detect personation; they also need to oversee the proceedings at the count and postal vote opening venues, and given the opportunity to object to rejected votes. You will need to establish how well your selected venues can accommodate access expectations and what adaptations may be required to support transparency while operating in line with public health guidelines.
- If you are satisfied that you are still able to use your usual or preferred venues, you will need to contact them early in your planning to establish whether they will be available. Where your usual venues are not available, or do not meet your requirements, you will need to identify suitable alternatives. If alternative venues that meet your requirements are not available, you will need to consider what adjustments to processes you can make to ensure available venues can be operated safely.
- If you decide to use an alternative venue for a polling station, 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 will be important to manage any necessary reviews as soon as you can as part of your preparations for the polls. You will also need to check the decision-making arrangements in place at your local authority to allow for any changes in polling places, and ensure that there are arrangements for any late changes, for example through delegated decision-making.
- 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 must be communicated clearly and in a timely manner to electors, candidates and other stakeholders as needed.
- If you change other venues, such as for postal vote opening or the count, you should confirm the venue you have selected to candidates and other stakeholders, and explain how you will operate within it, in order to promote confidence that the venue is safe.
- You should undertake contingency planning to minimise the impact on the delivery of the polls should a planned venue not be available unexpectedly, or at short notice.

Managing arrangements with your suppliers

- You should contact your suppliers to check that the services they provide are operational in the current circumstances and to confirm what contingency plans they have in place to continue to operate should local circumstances or restrictions change.
- Under the circumstances, it is possible that suppliers may have longer lead-in and/or delivery times than usual, and your plans for the conduct of the poll(s) should take account of this.
- You will need to be satisfied that your suppliers have the capacity to fulfil their contracts with you, bearing in mind the number and range of scheduled polls in 2021.
- You should agree the dates for exchanging any necessary data with your printers, and for reviewing and approving proofs of materials at an early stage in your planning with suppliers. You should also build into your plans key checkpoints for monitoring the delivery of your print contract.
- Where you are managing a poll which involves cross boundaries, or has a regional element, you will need to liaise with the RO(s) for the other area(s) as well as engage with the RRO in your early planning. Your early dialogue should inform decisions, ensuring as far as possible consistency of approach for electors across the electoral area.
- If you are delivering a number of polls in May, you will need to discuss the level of combination in your area with the RRO, and have early discussions about the options for combining postal ballot packs to ensure that you can manage the administrative impact and that voters get the best experience possible. Further guidance on the practical management of postal votes will be provided in separate guidance on absent voting.
- You will need to plan how you will continue to actively manage your contract with your suppliers under the circumstances, including how you will carry out necessary quality assurance checks on live printed material. You should plan and discuss the arrangements for carrying out live checks at an early stage with your print suppliers, to ensure that you can be satisfied that there are no errors in the printing, collation or despatch of voter materials. For example, you may want to explore whether your supplier could facilitate checks being carried out using video conferencing or other technological solutions if appropriate. We will provide more specific guidance on carrying out quality assurance checks in due course.

General guidance on the management of contractors and suppliers can be found in Part B of our [guidance for Returning Officers](#) at relevant elections, and we have also provided a [checklist on managing contractors and suppliers](#).

Other planning considerations

How will you...?

ÿ Update your communications plan and engagement strategy?

- You will need to think about what specific messaging needs to be in your communication plans to address the current public health situation. For example, how you will provide reassurance to the public that polling arrangements reflect public health advice, such as in relation to physical distancing measures and hygiene. Any communications should be kept under review to ensure they are up to date with national and any local public health measures that are in place in what is a changing picture.
- You will need to build in messaging about the different methods of voting which are available to electors, including postal voting, and ensure that deadlines are publicised widely and effectively.

ÿ Establish an estimated budget?

- You should estimate the costs of the poll(s) and identify what additional costs there may be and how these will be met.

Scottish Government has issued the [fees and charges order](#) for the Scottish Parliamentary election outlining the maximum recoverable amounts.

- **Ensure your plans remain flexible?**

You should aim to ensure your plans are sufficiently flexible to enable you to react to the evolving situation. For example, there may be changes in the restrictions in place to manage the pandemic generally, or there could be specific local circumstances which require you to be responsive and adapt your plans.

- Should you be affected by additional local measures impact on your plans to conduct the poll(s) as you had planned, please contact [your Commission team](#) who will be happy to discuss your local circumstances and determine how we can best provide support suited to your particular needs. You should also contact the EMB.

Appendix A

You can find a sample risk assessment document provided by the Electoral Management Board for Scotland on our website [here](#).

Please note that it is designed specifically for use by ROs in Scotland in the context of by-elections due to take place there in 2020 and 2021.

You can find a sample risk assessment document provided by Pembrokeshire Council for the management of the 2021 polls in light of coronavirus [here](#).

These documents are provided for use in informing your approach to risk assessments locally; they are not intended to act as formal templates.