

Key considerations for the delivery of the May 2021 polls: verification and count

Updates to this document

Updated	Description of change
12 March 2021	Amended to include guidance on the management of counting agents, advice to support Returning Officers with local decision-making on the management of the count, electoral law, and expanded advice on the management of 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 the delivery of the 2021 polls. To support you in planning for and delivering the polls, the Commission has issued supplementary guidance documents that focus on specific key parts of the electoral process.

The purpose of this document, which has been developed in consultation with the Electoral Management Board, AEA, 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 the verification and count at the May 2021 polls. It should be read alongside our [core guidance for electoral administrators](#).

Whilst public health considerations will likely mean that the verification and count will be managed differently than at previous elections, the law relating to the timing and management of the count has not changed and ROs will need also to consider how they can deliver the count locally whilst providing a safe environment for all those involved.

Whatever decisions you make regarding the management of the verification and count based on your local circumstances, you should ensure that you continue to treat all candidates, agents and political parties equally, and inform them of your plans at an early stage.

If, despite your best efforts, you are unable to meet the legislative requirements in full, you should ensure that you keep a clear audit-trail of your decision making process.

This guidance is a living document in recognition of the changing landscape and ongoing developments in public health advice. We will update this document as and when there is any additional information to reflect.

We have also issued [guidance for candidates and agents](#) to help make them aware that the arrangements that will be in place will likely be different to those they will have seen at previous elections, help them understand the changes to the election process that they can expect to see as a result of the coronavirus pandemic and to give them the information they need to be able to participate in the elections safely and with confidence.

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 and these should underpin all aspects of your preparations for the elections.

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

Timing of the verification and count

How will you...?

ÿ Determine when the verification and count will take place?

- Despite the current public health situation, there will still be an expectation among voters, candidates and the media that the results will be declared as soon as possible after the close of polls. It will be important for you to manage expectations effectively and communicate clearly on when counts will take place and results are likely to be declared, in order to help ensure public confidence in the process.
- The counting of votes must begin as soon as practicable after the close of poll. You should however bear in mind that the EMB may provide guidance on the timing of the count and this may set the overarching framework for your timings.
- Advice from our national public health bodies remains that as long as all those working with or handling paper take care to only be present if well, avoid touching their faces, and regularly and frequently clean their hands, there is no need to quarantine ballot papers before commencing the verification or count process.
- Your decision making process as RO should demonstrate how you will meet with your statutory duty to start counting as soon as practicable, whilst ensuring you are able to provide a safe environment for all those involved. Factors underpinning your decisions will include the following:
 - You will need to decide in which order election counts will take place. You will need to make this decision well in advance of polling day and should ensure that all stakeholders, including candidates, agents, parties, staff and

media are informed of your decision, and the rationale used in determining the order of election counts, at an early stage.

- Where you are managing a poll which crosses local authority boundaries, or has a regional element, you will need to liaise with the RRO to establish how your verification and count timings will fit into plans for the regional contest.
- The numbers of staff and other attendees that you can safely accommodate at the count venue will have an impact on how quickly you can verify ballot papers and move onto the count. You should bear this in mind when calculating your timings and ensure that they are realistic under the circumstances you are working in.
- The measures in place to ensure the safety of those present at the venue may mean that some processes, for example adjudication of doubtful ballot papers, may need to be managed differently to previous events and may take longer to deliver as a result.
- There are other practical factors that may have an impact on the timing of the verification and count:
 - Your choice of venue and any additional safety measures or mitigations you have in place.
 - Factors affecting the safe transportation and delivery of ballot boxes, including the impact of any additional measures to manage the safe drop-off of ballot boxes at the venue.
 - The potential for increased queues at the close of poll due to safety measures in place at polling stations could also lead to delays at the verification and count.
 - If you have more polling stations open than usual as a result of the pandemic, you will also need to take into account the increased number of ballot boxes.
- You should build in sufficient contingency in the event of any part of the process not progressing as anticipated: for example, a close contest could result in several recounts.

• **Communicate information about timings?**

- You should communicate with candidates and agents, political party representatives and the media about the timing of the verification and count as early as possible to gain their support for your plans and to manage their expectations.
- You will need to provide clear and specific information about what they can expect in relation to the timings of, and processes involved in, different parts of the verification and count and should make it clear in advance that any estimated timings are indicative. For example, you will need to explain the planned order of the counts and the anticipated duration, acknowledging that this may take place over multiple days. As part of this, you will want to ensure that candidates, agents and parties are aware that both the verification and count process itself and their attendance at and access to the event will look and feel very different to previous events.

- It will be important to emphasise that some processes, such as adjudication of doubtful ballot papers, may be managed differently to previous events and this may have an impact on how long they take to complete. You should outline your approach to these processes in advance and, as always, it will be important to ensure that all candidates, agents and political parties receive the same information in the interests of fairness and consistency.

Preparing for the verification and count

Managing your count venue

How will you...?

ÿ Set up your venue to meet public health requirements while still ensuring transparency of the verification and count process?

- As outlined in our supplementary guidance on [planning for the 2021 polls](#), you should make an early assessment about the suitability of any venue being used for election activities, including ensuring the venue is well ventilated as per [HSE guidance](#) and able to allow physical distancing for staff and other attendees, and identify any necessary adaptations.
- Whatever the size of the venue, you will need to determine a layout which ensures that physical distancing can be maintained between staff and between staff and those attending, in line with the [latest public health advice](#). For example, you should ensure that your layout of counting tables allows staff to remain physically distanced while still ensuring that all processes are carried out transparently and can be scrutinised by those who are entitled to attend; and that any likely pinch points of activity, such as the receipt of ballot boxes, are managed in such a way as to mitigate any risks of physical distancing not being maintained.
- You should provide reassurance to stakeholders that the current circumstances will not remove anyone's ability to observe and view the processes at the verification and count, and emphasise that although it may feel different to previous events, the processes in place are robust and have been designed to support them to observe safely.
- You could use clear screens, partitions or barriers to separate staff working at counting tables and those observing. However, you will need to consider how your use of such measures will continue to support the ability of candidates and agents to oversee and scrutinise the verification and count processes, including the adjudication of doubtful ballot papers.
- You should provide access to hand washing facilities and have hand sanitiser available for use both on entry to and exit from the venue. You should also remind attendees of good hygiene practices and the need to observe physical distancing throughout by displaying notices which encourage observance of the public health guidelines, including the requirement for all those in attendance at the count to wear a face covering unless exempt.
- You will need to develop a process to enable the safe receipt of ballot boxes at the venue. For example, this could involve setting up a one-way system into and out of the drop-off area and ensuring that no contact is made between individuals during the handover of boxes. You could also implement alternative measures, such as a

‘drive through’ arrangement, where count staff collect ballot boxes directly from vehicles to reduce the amount of people who enter or are present in the venue at any one time. Whatever process you use, you should ensure that all those involved in the delivery of ballot boxes are symptom-free and maintain physical distancing, and that cleaning materials are available to sanitise ballot boxes and any other contact points as needed.

- You will need to consider if you need to put specific measures in place to prevent bottlenecks or crowding in specific areas and how will you control access and capacity in particular areas of the verification and count. You could consider using marshals to control the numbers, but in doing so will need to ensure that processes are still carried out transparently and can be observed by everyone who is entitled to scrutinise proceedings and ensure priority is given to those who have a statutory role in overseeing the process.

Equipment

• How will you determine what additional equipment you need?

- You should identify at an early stage whether any additional equipment may be required in order to ensure that the verification and count venues are safe for all those in attendance. For example:
 - Tape for floor markings – floor markings inside and outside the verification and count venue will help to ensure that physical distancing can be maintained at all times, and could help to manage any queues of polling staff delivering their ballot boxes and materials, maintain distance between staff members and enable safe observation of the count process, and establish a one way system around the venue. It may be helpful to discuss the use of floor markings with the building owner in advance.
 - Additional signage – signs will be needed to remind attendees and staff at the verification and count of the need to follow public health guidelines such as physical distancing, the wearing of face-coverings and only entering if symptom-free.
 - Hand sanitiser – Public health bodies continue to emphasise the importance of hand cleaning. Hand sanitiser should be available on desks and at both the entrance and exit to the venue, with all attendees and staff encouraged to clean their hands on entry and exit accordingly. The use of gloves is not recommended.
 - Perspex screens - Government [guidance](#) states that members of staff in indoor premises where it is mandatory to wear a face covering and who are physically separated by means of, for example, partition screens, from members of the public, are not required to wear a face covering. As such, you may decide that the use of Perspex screens for staff sat at counting tables may be appropriate. You will need to consider how any use of screens can continue to support candidates’ and agents’ ability to oversee the proceedings.
 - Face coverings – the use of face-coverings will be required for all those entering the verification and count venue (unless subject to an exemption or for staff working behind an individual screen), in line with [government](#)

[regulations](#). All staff should have a face covering available, as while they may not wish to wear it if behind an individual screen, they will need to wear one when moving around the count venue. Whilst the majority of attendees and staff will likely be in possession of their own personal face covering, you should have a stock of face coverings available to provide to those who have forgotten their face covering and people should be advised to dispose of these face coverings themselves after they have left the venue.

- Technology and electronic communication tools – using email to transmit verification and count totals to the reconciliation staff or using technology to project the adjudication of ballot papers onto a large screen, for example, could minimise the handling of paper and help maintain physical distancing for key elements of the process. You could also offer live video streaming of elements of the verification and count.
- You should make arrangements with contractors and suppliers at an early stage to ensure that any additional equipment is purchased and has arrived in good time before the event. You will need to ensure any contractors used are able to demonstrate that their arrangements are in line with government and public health guidelines. You should ensure that hand sanitiser and face coverings are available for contractors making deliveries.

Staffing

How will you...?

ÿ Determine what roles you will need?

- As outlined in our supplementary guidance on [planning for the 2021 polls](#), you should consider carefully what additional roles you may need to be carried out at these polls as a result of coronavirus measures. For example:
 - You may need to deploy specific staff to manage the processes effectively, taking into account the combination of polls taking place as well as the public health context – for example, you may need to make more staff available to adjudicate on doubtful ballot papers, or to process postal votes at the count venue.
 - You may also need to assign dedicated staff to help ensure that physical distancing is maintained at key pinch points in the process where queues could develop, such as during the delivery of ballot boxes or at the entrance to the venue. To help manage this, the use of ‘greeters’ similar to those that may have been employed at polling stations could be used. Greeters could also encourage those attending to abide by the public health measures in place, such as the wearing of face coverings and sanitising their hands on entry and exit, and to answer any questions about what to expect inside the venue.
 - You will need staff to ensure that the venue and facilities are cleaned regularly as recommended by public health authorities. This includes ensuring that surfaces and equipment which are frequently touched are cleaned at regular intervals during the verification and count.
- You will also need to determine how many counting and verification staff you are able to deploy at each counting table or verification area given space limitations

due to physical distancing requirements. It may be the case that you will need to deliver the verification and count with fewer counting staff than in previous years as a result which may mean each stage of the process takes longer and should be factored into your planning.

- As part of your planning for the verification and count, you should establish a reserve list of staff to call on at short notice in case staff drop out due to illness or the need to self-isolate. You may find it helpful to establish reciprocal arrangements with neighbouring local authorities for sharing available staff in the event of one area being affected by drop outs more than others. All procedures should be clearly documented so that other staff can follow them if any key staff become unavailable unexpectedly or at short notice.
- The government has issued [guidance on the test and protect system](#) which is mandatory in certain sectors. Although the 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 the verification and count to maintain a clear audit trail of attendance, both for your own records and any requirements to support Test and Protect.

ÿ Manage staff at the verification and count?

- You should ensure that all staff are briefed about how you are adapting the processes and layout at the verification and count venue so that they are reassured that appropriate measures will be in place for their safety, and they know what to expect and what will be expected of them to meet public health requirements whilst carrying out their role.
- You should aim to minimise contact between individuals, 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. This will be particularly important if you anticipate the count extending over several days. Assigning staff into 'shifts' could help to manage this in practice. Grouping staff into pairs that work together at the verification and count could also be helpful in further minimising contact with others.
- You should allow your staff regular breaks, especially where they are wearing face coverings. You should consider how you can manage this in practice, ensuring that staff breaks are staggered to avoid any impact on the efficiency of the verification and count processes and to support with maintaining physical distancing.
- You should ask your staff to maintain their distance throughout the event, including during visits to the toilet, coffee or meal breaks when they may be tempted to relax, and socialise with other staff. To help manage this efficiently you could put in place markers that allow for physically distanced seating in break areas, for example. You may need to reinforce the importance of maintaining physical distancing and continuing to comply with hygiene requirements to those staff who will be employed to clear the venue after the conclusion of the count, to ensure that good practices are maintained throughout.

- You should provide hand sanitiser on any desk or table where staff may be working with paper. Everyone working with shared documents and papers should take great care to avoid touching their faces, and regularly and frequently wash their hands. You should continue to refer to the government guidance on this regularly, and especially in the run-up to the verification and count, to inform your approach.
- You should also remind staff to be aware of the [symptoms of coronavirus](#). No-one should attend the verification and count if they are unwell, symptomatic with COVID-19, a confirmed case or a confirmed contact of someone who is self-isolating.

Verification and count process

How will you...?

ÿ Deliver the verification and count?

- In designing each stage of the verification and count process you need to be clear who is doing what, where and how, and communicate this in advance with staff and candidates and agents. This will be particularly important to ensure confidence in the process, given that the count is likely to look different to previous events as a result of the measures put in place to ensure everyone's safety.
- You will need to take into account the impact the safety measures in place may have on your usual arrangements and adapt them accordingly. For example, you may have less space available than usual given the need to maintain physical distancing, which may mean your counters need to work in smaller teams to fit into the space available.
- Throughout the process you need to ensure that the secrecy of the vote is maintained. Ballot papers must be kept face up during the verification and count process and it is important that, despite any safety measures you may have in place, anyone observing the process has a clear view of proceedings. You should also keep in mind the need to maintain transparency. For example, any agents present may make copies of the verification statement and you should provide copies to them on request, so you will need to decide how you will manage this in line with the public health safety measures you have put in place. More detail on managing interactions with candidates, agents and other observers is covered in the 'Attendance at the verification and count' section below.

Attendance at the verification and count

How will you...?

ÿ Determine overall attendance at the verification and count?

- You will need to make decisions about who is able to attend the verification and count based on the size of your venue and the impact of physical distancing measures you have implemented on the space available to accommodate attendees and support their observation of the process safely.
- As part of your decision making about managing access within the verification and count venue you could consider:

- Is there sufficient space available for candidates and their appointed agents to access the verification and count process across the whole count venue or does the layout or available space in each area mean that you will need to designate access to specific areas? You will need to ensure that designated attendees are able to observe all processes they are entitled to scrutinise. You could issue colour-coded wrist bands to help manage the access to these areas or specific tables where practicable. For example, you might decide to impose a limit of only one representative for each candidate/party being able to observe at each table at any one time for public health reasons. It will be important to ensure that any such limits are imposed and applied equally throughout the process.
- You should consider which parts of the process each category of attendee is entitled to oversee. For example, counting agents for all polls are entitled to attend the verification stage. This will require careful planning and management as all agents may wish to be present for this stage and you will need ensure that they are able to effectively scrutinise the process whilst maintaining the safety of everyone present.
- You will need to determine whether there is sufficient space within the venue to enable the attendance of your guests. If space is an issue and having additional people present at the count is likely to impact upon the ability for all to maintain physical distancing, for example, you should limit the number of people that you invite to observe proceedings accordingly.

ÿ Determine the number of counting agents per candidate?

- You will need to ensure that your set-up of the venue and processes enables oversight of all counting tables and adjudication areas without compromising safety. This will include an assessment of the numbers of attendees that your layout can safely accommodate, which in turn will help you determine the number of counting agents that can safely attend the verification and count.
- Where space is limited in your venue, you could consider whether limiting the number of counting agents appointed per candidate is an option for safety reasons. As set out in Part C of our [core guidance for Returning Officers](#), the law does allow for the limiting of the number of counting agents permitted to attend the verification and count where there are special circumstances, and whilst it is important to ensure candidates and agents are able to fulfil their scrutiny role, you should consider health and safety implications when setting the maximum number. It is our view that a decision to limit numbers using this provision where it is necessary in order to ensure adherence to coronavirus public health advice and to ensure the safety of all those involved is likely to be regarded as such a special circumstance.
- In making this decision, you will need to take into account the implications of allowing fewer agents to attend and whether your decision will enable sufficient scrutiny of the verification and count process. Candidates', agents' and counting

agents' scrutiny at the verification and is an essential part of the verification and count process and gives assurance that an accurate result is produced. Whatever decision you make, the maximum number of counting agents appointed per candidate must be same in each case.

- Where you decide to limit the number of counting agents allowed to attend the count, you should engage with candidates and agents at an early stage to inform them of the decision and the factors considered in reaching your decision, including how you have implemented any relevant public health advice. You should also fully document all stages of your decision making for audit trail purposes.

ÿ Manage attendees at the verification and count?

- It is important that those attending the verification and count adhere to the arrangements you have put in place to create a safe environment, including the importance of good hand hygiene, the need to observe physical distancing and the requirement to wear a face-covering unless exempt. Clear communication before the event can help you to gain attendees' support for these arrangements to help ensure that they are able to participate safely and effectively. This should also help to ensure their confidence in the arrangements you've put in place and will provide clarity on what they should expect and will be asked to do.
- You will also need to think about how to manage any members of the media who are present at the verification and count. You could consider establishing physically-distanced areas for media representatives that allow the opportunity to oversee the proceedings from a distance and fulfil their role to report on the progress and results throughout the event.
- If you ask someone to leave the verification and count, you should keep a log of events to help you to demonstrate your decision-making process.

ÿ Communicate with attendees at the count?

- Providing early clarity on any adaptations to your usual approach to managing the verification and count in light of coronavirus will help to get buy-in for your approach and manage expectations. It will also provide reassurance that attendance at the verification and count will be safe and that arrangements will reflect national and local public health advice.
- As always, it will be important to ensure that candidates, agents and political parties receive the same information in the interests of fairness and consistency.
- All candidates and agents should be made aware that no-one should attend the verification or count if they are unwell, symptomatic with COVID-19, a confirmed case or a confirmed contact of someone who is self-isolating. You should consider how you will deal with requests from candidates who wish to replace counting agents that have become unavailable at late/ short notice.
- This information should be covered in your briefings for candidates and agents and/or in writing, and should contain clear and consistent messaging to help manage expectations and alleviate concerns in advance of the verification and count, and can be tailored to address any concerns raised locally. You can also take the opportunity to remind attendees to bring their face covering to the event.

- If you plan to provide an information pack on arrival at the venue, you should include within it a reminder about the public health guidelines that will be in place at the count venue which will help to provide reassurance that appropriate measures are in place for their safety and help to ensure that they know what to expect and how to behave. This could include a floorplan showing your planned layout and any one-way routing you expect to implement.
- It will be important to make regular announcements during the event. These can help you promote transparency by updating attendees about progress with the verification and count stages, as well as providing further opportunities to reinforce your messaging about physical distancing and hygiene measures. If you are using a split venue due to physical distancing you will need to ensure that each area receives the same information.
- You will need to decide and communicate in advance how you propose to manage and deliver the declaration of results. You will need to establish a process for safely communicating provisional results to candidates and agents, and to seek their agreement on the announcement of the result. Depending on the available space at the venue, it may not be possible to gather candidates together for the announcements and allow acceptance and concession speeches while complying with physical distancing measures. If you decide that the traditional arrangements will not be feasible under these circumstances, you should ensure that you are nevertheless able to communicate the results of the polls in line with legislative requirements and that all stakeholders, including media representatives, are aware of your planned arrangements in advance.