

AGENDA

Meeting: Electoral Review Committee
Place: The Cotswold Space - County Hall, Bythesea Road, Trowbridge, BA14 8JN
Date: Tuesday 18 December 2018
Time: 3.00 pm

Please direct any enquiries on this Agenda to Kieran Elliott, of Democratic Services, County Hall, Bythesea Road, Trowbridge, direct line 01225 718504 or email kieran.elliott@wiltshire.gov.uk

Press enquiries to Communications on direct lines (01225) 713114/713115.

This Agenda and all the documents referred to within it are available on the Council's website at www.wiltshire.gov.uk

Membership:

Cllr Ian Blair-Pilling	Cllr Christopher Newbury
Cllr Clare Cape	Cllr Ashley O'Neill
Cllr Richard Clewer (Chairman)	Cllr Jonathon Seed (Vice-Chairman)
Cllr Gavin Grant	Cllr Stuart Wheeler
Cllr Ian McLennan	Cllr Graham Wright

Substitutes:

Cllr Peter Fuller	Cllr Jacqui Lay
Cllr Ruth Hopkinson	Cllr Ricky Rogers
Cllr Nick Murry	Cllr Ian Thorn

Recording and Broadcasting Information

Wiltshire Council may record this meeting for live and/or subsequent broadcast on the Council's website at <http://www.wiltshire.public-i.tv>. At the start of the meeting, the Chairman will confirm if all or part of the meeting is being recorded. The images and sound recordings may also be used for training purposes within the Council.

By entering the meeting room you are consenting to being recorded and to the use of those images and recordings for broadcasting and/or training purposes.

The meeting may also be recorded by the press or members of the public.

Any person or organisation choosing to film, record or broadcast any meeting of the Council, its Cabinet or committees is responsible for any claims or other liability resulting from them so doing and by choosing to film, record or broadcast proceedings they accept that they are required to indemnify the Council, its members and officers in relation to any such claims or liabilities.

Details of the Council's Guidance on the Recording and Webcasting of Meetings is available on request. Our privacy policy can be found [here](#).

Parking

To find car parks by area follow [this link](#). The three Wiltshire Council Hubs where most meetings will be held are as follows:

County Hall, Trowbridge
Bourne Hill, Salisbury
Monkton Park, Chippenham

County Hall and Monkton Park have some limited visitor parking. Please note for meetings at County Hall you will need to log your car's registration details upon your arrival in reception using the tablet provided. If you may be attending a meeting for more than 2 hours, please provide your registration details to the Democratic Services Officer, who will arrange for your stay to be extended.

Public Participation

Please see the agenda list on following pages for details of deadlines for submission of questions and statements for this meeting.

For extended details on meeting procedure, submission and scope of questions and other matters, please consult [Part 4 of the council's constitution](#).

The full constitution can be found at [this link](#).

For assistance on these and other matters please contact the officer named above for details

AGENDA

1 **Apologies**

To receive any apologies or substitutions for the meeting

2 **Minutes** (*Pages 5 - 12*)

To approve the minutes of the meetings held on 2 October 2018 and 8 October 2018.

3 **Declarations**

To receive any declarations of disclosable interests or dispensations granted by the Standards Committee.

4 **Chairman's Announcements**

To receive any announcements through the Chair

5 **Public Participation**

Statements

If you would like to make a statement at this meeting on any item on this agenda, please register to do so at least 10 minutes prior to the meeting. Up to 3 speakers are permitted to speak for up to 3 minutes each on any agenda item.

Please contact the officer named on the front of the agenda for any further clarification.

Questions

To receive any questions from members of the public or members of the Council received in accordance with the constitution.

Those wishing to ask questions are required to give notice of any such questions in writing to the officer named on the front of this agenda no later than 5pm on 11 December 2018 in order to be guaranteed of a written response. In order to receive a verbal response questions must be submitted no later than 5pm on 13 December 2018. Please contact the officer named on the front of this agenda for further advice. Questions may be asked without notice if the Chairman decides that the matter is urgent.

Details of any questions received will be circulated to Committee members prior to the meeting and made available at the meeting and on the Council's website.

6 **Polling District and Polling Place Review** *(Pages 13 - 44)*

To receive an update on the forthcoming review of polling districts and polling places.

7 **Urgent Items**

Any other items of business, which the Chairman agrees to consider as a matter of urgency

ELECTORAL REVIEW COMMITTEE

MINUTES OF THE ELECTORAL REVIEW COMMITTEE MEETING HELD ON 2 OCTOBER 2018 AT COUNCIL CHAMBER - COUNTY HALL, BYTHESEA ROAD, TROWBRIDGE, BA14 8JN.

Present:

Cllr Ian Blair-Pilling, Cllr Richard Clewer (Chairman), Cllr Gavin Grant, Cllr Ian McLennan, Cllr Ashley O'Neill, Cllr Graham Wright and Cllr Ruth Hopkinson (Substitute)

Also Present:

Cllr Peter Fuller and Cllr Fred Westmoreland

44 Apologies

Apologies for absence were received from Councillors Christopher Newbury, Jonathon Seed and Stuart Wheeler.

Apologies were also received from Councillors Ashley O'Neil and Graham Wright, that they would arrive late to the meeting.

45 Minutes

The minutes of the meeting held on 5 September 2018 were presented for consideration and it was,

Resolved:

To approve and sign the minutes as a true and correct record

46 Declarations of Interest

There were no declarations.

47 Chairman's Announcements

There were no announcements.

48 Public Participation

A comment was received at the meeting from a representative of Chute Parish Council, supporting the proposed division in that area. In response to a question on the names of divisions it was confirmed the ones detailed in the agenda documents were placeholders only.

Councillor Richard Clewer, Chairman of the Electoral Review Committee, presented the draft council wide pattern of divisions proposal as contained within agenda supplements 1 and 2. It was emphasised that the Local Government Boundary Commission for England (LGBCE) was running a consultation from 28 August to 5 November, and Wiltshire Council was only a consultee in that process. It was noted that all parishes had been contacted on multiple occasions to draw their attention to the review, and information gathering sessions held for each existing area board. All comments received had been circulated to all councillors.

In preparing a council wide submission it was explained as also detailed in agenda supplement 3 that key principles had been applied when preparing new divisions. These included: the abiding principle that every effort be made to ensure divisions were within a variance of 10% from the target number of electors of 4263; that area boards, being critical to the decision of the LGBCE to retain a council size of 98, should be maintained wherever possible in a similar form as their existing one; that where previous Community Governance Reviews had made a decision on existing built up urban areas that those decisions be followed when drawing up proposed divisions; to preserve parishes in their entirety wherever possible except where community interest determined otherwise; that wherever possible divisions should be entirely urban or entirely rural; and that where known new development was to take place on the edge of an urban area that the default position should be that the areas should be contained within the same division. This would be without prejudice to any possible future governance reviews.

The Committee endorsed the use of those principles in developing proposals, and then discussed the draft submission documentation in detail. It was recognised that any alterations to the proposal at committee or council would need to have no effect or mitigated effect on the rest of the proposal, to ensure coherence. It was also strongly highlighted that in all urban areas many lines remained indicative and would be subject to some change up to and beyond the council meeting on 16 October. This was because calculating electors by individual street would be required, and therefore some of the lines might contain too few or too many electors, which was the critical factor.

In discussing the proposals, the Committee discussed a number of key areas. In relation to the proposed division of Amesbury West and Bulford it was stated that further discussions had been had with local councillors, and an alternative was suggested to include sections of the current Amesbury East division with the parish of Bulford, and that this represented a community focused proposal. The Committee accepted the suggestion for incorporation within the overall draft proposal.

In relation to proposed divisions with the Trowbridge community area the Committee discussed at length the proposed inclusion of new urban areas, geographic barriers within the area, and the nature of any communities within the town and how to divide divisions, and confirmed that significant housing was

predicted to be delivered in time for new elections to make a new division including that development to be viable. Further suggestions had been sought from local councillors and would be considered ahead of the meeting on 8 October.

It was also noted that a meeting had been arranged to discuss further minor changes in the Corsham area.

The Committee also discussed the proposals for the Southern Area Board. The draft proposal included a division at 11% variance, and during workshop sessions it had been requested to explore further alternatives. It was reported that a great many alternatives had been considered but that when considering the statutory criteria other options required the division of multiple parishes in arbitrary fashion which did not have any community basis, and therefore the proposed draft was the most acceptable option, even with its variance slightly too high. Given the nature of development in the area, however, it was suggested that the proposed division would find itself within acceptable variance within a few years.

The Committee were also strongly of the view that all of Laverstock and Ford Parish should be contained within a single Area Board, and that this should be the Southern Area Board.

In discussing the proposals regarding Salisbury the Committee discussed potential areas for slight amendments to boundaries including with the Bemerton areas and St Pauls among others, and noted that an east west dividing line in the Harnham area was most suitable due to the increase in electorate in that area making a north south line unviable with the inclusion of new development.

In relation to the Royal Wootton Bassett and Cricklade proposals the Committee discussed suggestions that in addition to the latest new development at the far south east of Purton parish which it was proposed be moved to another division due to Purton being too large, that the existing housing in that same area be moved as it was once cohesive community. This would as a result require the moving of Broad Town parish into the proposed Lyneham division, which it was felt would be more appropriate considering the inclusion of Broad Hinton as well. Additionally, as Winterbourne Bassett was a joint parish council with Broad Hinton, this should also be included, while keeping all divisions within acceptable electoral variance.

The Committee also discussed various options for the Melksham area at length, including the inclusion of additional parishes from other areas, joining the north of the town with the northern part of Melksham Without parish, the inclusion of Broughton Gifford with the southern parishes and more. The Committee accepted that the division of Bowerhill into multiple divisions was not an ideal solution, although it noted that the parish to which Bowerhill belonged, Melksham Without, would under any solution require multiple divisions. The Committee agreed that the external boundary of the new area board should be as proposed in the draft submission, and noted that further discussion would be

taking place with local councillors to discuss how to fit divisions within that boundary.

The Committee also expressed thanks to the Chairman, project team, and the Portfolio Holder, Councillor Ashley O'Neil, for their dedicated, cross party work to develop a satisfactory and coherent council wide solution.

At the conclusion of discussion and on the motion of Councillor Richard Clewer, seconded by Councillor Gavin Grant, it was,

Resolved:

To approve the draft submission for recommendation to Full Council, subject to:

- 1) further discussions on proposed divisions for Melksham Area Board, within the external boundaries as shown by the existing proposals;**
- 2) further amendments to minor movements inside the defined urban areas to be delegated to the Director of Legal and Democratic Services after consultation with the Chairman of the Committee;**
- 3) Final confirmation at the meeting to be held on 8 October 2018.**

50 **Urgent Items**

There were no urgent items.

(Duration of meeting: 9.35 - 11.20 am)

The Officer who has produced these minutes is Kieran Elliott of Democratic Services, direct line 01225 718504, e-mail kieran.elliott@wiltshire.gov.uk

Press enquiries to Communications, direct line (01225) 713114/713115

ELECTORAL REVIEW COMMITTEE

MINUTES OF THE ELECTORAL REVIEW COMMITTEE MEETING HELD ON 8 OCTOBER 2018 AT KENNET ROOM - WILTSHIRE COUNCIL OFFICES, COUNTY HALL, TROWBRIDGE.

Present:

Cllr Ian Blair-Pilling, Cllr Clare Cape, Cllr Richard Clewer (Chairman), Cllr Ian McLennan, Cllr Christopher Newbury, Cllr Ashley O'Neill, Cllr Jonathon Seed (Vice-Chairman), Cllr Stuart Wheeler and Cllr Ruth Hopkinson (Substitute)

Also Present:

Cllr Richard Britton, Cllr Derek Brown OBE, Cllr Pauline Church, Cllr Matthew Dean, Cllr Sven Hocking and Cllr Jerry Wickham

51 Apologies

Apologies were received from Councillors Gavin Grant and Graham Wright.

Councillor Grant was substituted by Councillor Ruth Hopkinson.

52 Declarations of Interest

There were no declarations.

53 Chairman's Announcements

There were no announcements.

54 Public Participation

A statement was received from Mr Francis Morland. He noted the principles applied to develop division proposals and queried why the Warminster area included further proposed divisions with an urban/rural split, which was not sought in the principles. It was explained that representations from local members had indicated in that particular instance such a split was an appropriate solution.

Mr Morland also noted the division proposals combined the entirety of Heywood Parish within a single division, and asked that the Local Government Boundary Commission for England be requested to de-ward the parish as a result, as it

had only been warded since at present the parish was split across two unitary divisions.

55 **Electoral Review Update - Stage One Submission**

The Chairman updated the Committee on developments with the Electoral Review since the meeting held on 2 October 2018, at which the Committee had approved the draft division proposals with the exception of the divisions comprising Melksham Area Board, where further work was requested. The Committee had also noted that urban division lines were indicative and that further adjustments would follow in many areas.

In relation to Salisbury specific changes were outlined in the Bemerton Heath area, to retain as much of the older established part of the community as possible within a single division, and other adjustments were also detailed including retaining the church of St Paul's within the area formerly covered by the St Paul's division.

The Committee then discussed at length the draft division proposals which included the Bishopdown area, now wholly within Laverstock Parish, within a division assigned to the Southern Area Board. Members representing Salisbury divisions in attendance remained strongly of the view that the area was a clear urban extension of the city, and that ideally the area should be included within a city based division. It was noted by the Committee that such a decision would have significant implications for the proposals across the Southern region as a whole, and was felt not to pay due attention to the Community Governance Review decision in 2016 which had moved the area wholly into Laverstock Parish.

It was raised that the proposed Laverstock division comprising the areas of Bishopdown, Longhedge and Old Sarum, could be included within the Salisbury Area Board, without compromising the integrity of the parish by formally including any part of it with a part of the city parish. However, it was noted that this would mean the parish was still divided between two area boards, which was strongly opposed by some members.

After debate the Committee agreed to note that which divisions were included in which area board was a decision for Full Council, and could be analysed fully once the draft recommendations of the Local Government Boundary Commission for England (LGBCE) were known.

The Committee then discussed revised proposals for the Melksham area. It was explained that further meetings had been held with local members and some parish council representatives. It had been noted that the initial proposals to divide the Bowerhill area of Melksham Without had been strongly resisted as inappropriate on a community basis. As the town of Melksham itself was too large to contain 3 divisions, and too small for 4 divisions, and because the parish of Melksham Without was also required to be divided, it was proposed instead to join an area of north Melksham with the areas of Whitley, Shaw and Beanacre with which there was close connection, and create three other town

divisions. Broughton Gifford would then be included in a division containing the southern section of Melksham Without not containing Bowerhill, and the remaining parishes. It was acknowledged this was not an ideal solution due to the geography of Broughton Gifford, but on balance was considered more appropriate than dividing Bowerhill into three divisions.

The Committee discussed the proposals, and it was agreed that although not a perfect solution, they represented the best set of proposals for the area that had been received to date.

During other discussion it was confirmed that only nominal names would be sent to the LGBCE with the proposal, and that Full Council would consider finalised names once the draft recommendations were known.

At the conclusion of discussion, it was,

Resolved:

To approve the draft submission for recommendation to Full Council, including the revisions to the Salisbury and Melksham area proposals, and subject to further amendments to minor movements inside the defined urban areas to be delegated to the Director of Legal and Democratic Services after consultation with the Chairman of the Committee;

56 **Urgent Items**

There were no urgent items.

(Duration of meeting: 12.30 - 1.45 pm)

The Officer who has produced these minutes is Kieran Elliott of Democratic Services, direct line 01225 718504, e-mail kieran.elliott@wiltshire.gov.uk

Press enquiries to Communications, direct line (01225) 713114/713115

This page is intentionally left blank

Wiltshire Council

Electoral Review Committee

18 December 2018

Polling District and Polling Place Review

Purpose

1. To consider the data gathering arrangements and a programme of work for the **preliminary** and **formal** polling district and polling place review.

Background

2. The Council is required by the Electoral Registration and Administration Act 2013 to undertake a compulsory review of UK Parliamentary polling districts and polling places which must be started and completed between 1 October 2018 and 31 January 2020 (inclusive).
3. The Electoral Registration and Administration Act 2013 amended the Representation of the People Act 1983 to require the Council to undertake regular reviews of both polling districts and polling places within its area. The differences between a district, place and station are:
 - A **polling district** is a geographical sub-division of an electoral area, (an electoral area being a UK Parliamentary constituency, a European Parliamentary electoral region, a parish, parish ward or an electoral division).
 - A **polling place** is the building or area in which polling stations will be selected by the Returning Officer. A polling place within a polling district must be designated so that polling stations are within easy reach of all electors from across the polling district.
 - A **polling station** is the actual area where the process of voting takes place, and must be located within the polling place designated for the particular polling district. The Returning Officer for the particular election must provide a sufficient number of polling stations, and allocate the electors to those polling stations in such manner as he or she thinks the most convenient.
4. The purpose of such a review is ensure that all electors have reasonably practicable facilities for voting and that polling places are reasonably accessible to electors who are disabled. The review will need to be completed by 31 January 2020.
5. The Act requires the Council to publish notice of a Polling District and Polling Place review and to consult both the Acting Returning Officer (ARO) for Parliamentary elections and persons whom the Council considers have particular expertise in relation to access to premises or facilities for persons who have disabilities. In addition, anyone may comment on the review.

6. This report therefore focuses on the programme of work to be undertaken by the ARO and considerations the Committee need to be mindful of.

Main Considerations

7. In relation to the 1 October 2018 – 31 January 2020 period, (Acting) Returning Officers will need to consider the following:

The annual canvass

Conducted between July and December 2019

Publication of the register

Revised electoral register scheduled to be published on 1 December 2019

Elections during the review period

There are no scheduled elections in 2019, and the programme of work should reflect the ability to be flexible with the dates in the event of a national poll.

Scheduling approval of the proposals

Implementation of any amendments to polling districts to co-ordinate with the publication of the revised register in December 2019.

Proposals to be submitted to Full Council in good time for approval prior to publication.

Changes to electoral boundaries

Anomalies created by previous Community Governance Reviews can be adjusted where possible to reduce the number of very small polling districts

As the polling district and polling place review is to be carried out before the new electoral boundaries are fully in force, it will need to be based on the current electoral boundaries. A further review will be undertaken prior to the unitary and parish elections in 2021 to reflect the new boundaries.

Preliminary review

8. The local authority should undertake a preliminary review of the current polling districts and polling places with a view to establishing their suitability, and identify any potential alternatives where required. This may be done before the start of the specified review period.
9. There is no requirement to change any of the polling districts and polling places if they are suitable, but any 'no change' decision must be fully justified as part of the overall proposals.

Formal review process

10. The Electoral Commission's guidance is attached at **Appendix A** which provides more detailed requirements on the Formal Review Process (para 4.5) and Considering Accessibility Issues (para 4.6).

11. In accordance with the guidance, when carrying out the review, local authorities must:

- publish a notice of the holding of a review
- consult the ARO for every parliamentary constituency which is wholly or partly in its area
- publish all representations made by an ARO within 30 days of receipt by posting a copy of them at the local authority's office and in at least one conspicuous place in their area and, if the authority maintains a website, by placing a copy on the authority's website
- seek representations from such persons as it thinks have particular expertise in relation to access to premises or facilities for persons who have different forms of disability. Such persons must have an opportunity to make representations and to comment on the representations made by the AROs.
- on completion of a review, give reasons for its decisions and publish:
 - a. all correspondence sent to an (Acting) Returning Officer in connection with the review
 - b. all correspondence sent to any person whom the authority thinks has particular expertise in relation to access to premises or facilities for persons who have different forms of disability
 - c. all representations made by any person in connection with the review
 - d. the minutes of any meeting held by the council to consider any revision to the designation of polling districts or polling places within its area as a result of the review
 - e. details of the designation of polling districts and polling places within the local authority area as a result of the review
 - f. details of the places where the results of the review have been published

12. The Committee will initially need to determine a pattern of activity (formal meetings and workshops) for itself in order to achieve the deadline of the publication of the revised register (1 December 2019).

13. The following has therefore been provisionally identified as a suggested timetable:

Activity	Suggested date
Preliminary review commences	December 2018
Information gathering from: <ul style="list-style-type: none"> • Polling station venues • External reviews • Wiltshire disability groups • Wiltshire Carers groups 	December 2018
Information to Area Boards <ul style="list-style-type: none"> • 8 Jan – Malmesbury • 10 Jan – Trowbridge • 14 Jan – Devizes • 16 Jan – Bradford-on-Avon • 17 Jan – Amesbury • 18 Jan – Pewsey • 19 Jan – Calne • 20 Jan – Corsham and Royal Wootton Bassett 	January/ February 2019

<ul style="list-style-type: none"> • 21 Jan - Salisbury • 28 Jan – Tidworth • 29 Jan – Marlborough • 30 Jan – South West Wiltshire • 31 Jan – Southern Wiltshire • 4 Feb – Chippenham • 13 Feb – Melksham • 14 Feb - Warminster • 21 Feb – Westbury 	
Gather and analyse evidence, including representations from Area Boards and electoral forecasts.	January to May 2019
Report to the Committee on the outcome of the preliminary review, including boundary maps and electorates	6 June 2019
Publish a notice of the holding of the review	10 June 2019
Publish ARO representation	11 June 2019
Consultation period	12 June to 9 September 2019
Committee to consider draft recommendations	26 September 2019
Full Council to consider recommendation from Committee	15 October 2019
Revised register	1 December 2019

Proposal

14. The Committee is asked to:

- 1) note the two stages of the polling district and polling place review; preliminary and formal reviews (*para 8 -10*);
- 2) consider the approach to be taken for the preliminary and formal reviews (*para 10*), and;
- 3) determine the indicative timetable for the review (*para 13*).

Ian Gibbons, Director of Legal and Democratic Services (and Monitoring Officer)

Report Author: Maggie Mulhall, maggie.mulhall@wiltshire.gov.uk

Appendices

Appendix A – Electoral Commission; Guidance on the review of polling districts and polling places

Reviews of polling districts, polling places and polling stations

This guidance provides a staged approach to conducting a review of polling districts, polling places and polling stations according to the relevant legislative requirements. It builds on the guidance we have previously issued, and has benefited from feedback from local authorities on their experiences of carrying out their previous reviews. It also incorporates learning from the Commission's experience of administering the appeals process over the past five years.

1 Timing of compulsory reviews

1.1 The Electoral Registration and Administration Act 2013 introduced a change to the timing of compulsory reviews of UK Parliamentary polling districts and polling places. The next compulsory review must now be started and completed between 1 October 2018 and 31 January 2020 (inclusive).

1.2 Subsequent compulsory reviews must be started and completed within the period of 16 months that starts on 1 October of every fifth year after 1 October 2013.

1.3 A 'review' is all the steps set out in Schedule A1 to the Representation of the People Act 1983 (RPA 1983). Further information on what these steps are is included [later in this document](#). The review process, from the publication of the notice of the review until the publication of the documents at the end, must take place within the specified period.

1.4 The length of the review process is not prescribed, provided all the steps required by the legislation can be undertaken within it. However, the time allowed for consultation should be sufficient to enable interested persons and groups to read and understand the proposals, gather comments and respond with any alternative arrangements that they may wish to submit. The local authority may wish to have regard to any council guidelines on public consultation when carrying out the review.

1.5 Local authorities will need to decide when to carry out the review within the specified 16-month-period. In practice, (Acting) Returning Officers will often be asked to decide when the review should take place. In reaching their decision on timing, (Acting) Returning Officers will need to consider what other statutory duties and processes they and their staff will be carrying out in that time and how the review will fit with these.

1.6 In relation to the 1 October 2018 – 31 January 2020 period, (Acting) Returning Officers will need to consider the following:

- **The canvass**

As in England and Wales the Acting Returning Officer is also the Electoral Registration Officer (ERO), any canvass period will be a busy time during which to conduct a review. Consideration will need to be given to resource requirements if the review process is to be started on or shortly after the start of a canvass as there will be some overlap between canvass activity and the review.

In Scotland, as the office of the Returning Officer is separate to that of the Electoral Registration Officer, the conduct of the canvass may have less of an impact on the conduct of the review.

- **Publication of the register**

The potential additional workload resulting from undertaking the review at the same time as carrying out canvass activity needs to be balanced against the benefits of completing a review in time for publication of the revised register. Completing the review in time for publication of the revised register means that any changes can be reflected in it, and that no subsequent alterations to the structure of an already published register will need to be made, thus avoiding the potential need to publish a further revised register.

- **Elections during the review period**

During the review period, there will be scheduled polls and could potentially be unplanned polls. . In each case, consideration will need to be given to how the work on a review would interact with any election/referendum preparations, including when work would need to be completed to avoid an impact on election/referendum processes.

- **Scheduling approval of the proposals**

It is important to factor into the timetable the most likely scheduled date of the council/committee meeting where the detailed review proposals would be formally considered and approved. The review officers should work closely with the lead officer in charge of these meetings to ensure that the date of the meeting and related deadlines can be factored into the review timescale.

- **Changes to electoral boundaries**

A number of local authorities may also have their local electoral boundaries reviewed during the 16-month period. If this is the case, (Acting) Returning Officers will need to consider how the electoral boundary review will fit with the polling district /polling place review and whether it would be possible and desirable to align the two.

Where the polling district/place review is to be carried out before the new electoral boundaries are fully in force, it will need to be based on the current electoral boundaries, but should also take any new boundaries

that are not yet in force into account. To avoid having to review the polling districts and polling places again once the new boundaries are fully in force, any parts of existing electoral areas that will be split when the new boundaries come into effect could be made into separate polling districts as part of the review.

Also, until the new boundaries are fully in force, the register will need to be constructed in a way that is capable of reflecting the current and the new boundaries. Again, this can be achieved by making any parts of existing electoral areas that will be split when the new boundaries come into effect into separate polling districts.

For the same reasons where, as a result of a review of one set of electoral boundaries, the boundaries for different elections are no longer co-terminous, those areas that are no longer co-terminous could be also be made into separate polling districts.

2 Roles and responsibilities and definition of terms

Roles and responsibilities

The local authority

2.1 The statutory responsibility for reviewing UK Parliamentary polling districts and places rests with each relevant local authority in Great Britain for so much of any constituency as is situated in its area. A relevant local authority is, in England, the council of a district or London borough, in Scotland, a local authority, and, in Wales, the council of a county or county borough.

2.2 Depending on the structure of the local authority, it may not be the full council which makes the decisions on any changes to polling districts or polling places. Some local authorities may have delegated that function, in which case the decision on polling districts and polling places becomes the responsibility of a committee or sub-committee. This will be set out in the council's constitution.

The Electoral Registration Officer

2.3 Where a local authority makes any alterations to the polling districts within its area, the ERO must amend the register of electors accordingly – either on a notice of alteration or by publishing a revised register. The changes to the register take effect on the date that the ERO publishes a separate notice stating that the alterations have been made, which should be done to coincide with the publication of a notice of alteration/publication of a revised register.

The (Acting) Returning Officer

2.4 The (Acting) Returning Officer must comment during any review of UK Parliamentary polling districts and polling places on both existing polling stations and the polling stations that would likely be used if any new proposal for polling places were accepted.

2.5 The election rules require the (Acting) Returning Officer to decide how many polling stations are required for each polling place and they must allocate electors to the polling stations in such manner as they think most convenient.

The Electoral Commission

2.6 While legislation provides no role for the Commission in the review process, it does provide for a role after the conclusion of the review.

2.7 Once the local authority has published the results of its review, specified interested parties (see paragraph 7.2 below) may make representations to the Commission to reconsider any polling districts and polling places. We may

direct the authority to make any alterations to the polling places that we think necessary and, if the alterations are not made within two months, we may make the alterations ourselves.

Definition of terms

UK Parliamentary constituencies

2.8 The Parliamentary Constituencies Act 1986 states:

‘There shall for the purpose of parliamentary elections be the county and borough constituencies (or in Scotland the county and burgh constituencies), each returning a single member, which are described in Orders in Council made under this Act. [...] In this Act and, except where the context otherwise requires, in any Act passed after the Representation of the People Act 1948, “constituency” means an area having separate representation in the House of Commons.’

2.9 UK Parliamentary constituency boundaries cannot be changed by the review.

Polling district

2.10 A polling district is a geographical area created by the sub-division of a UK Parliamentary constituency for the purposes of a UK Parliamentary election.

2.11 In England, each parish is to be a separate polling district and, in Wales, each community should be a separate polling district, unless there are special circumstances. This means that a parish or community must not be in a polling district which has a part of either a different parish or community within it, or any un-parished part of the local authority area within it, unless special circumstances apply. Those special circumstances could arise if, for example, the parish/community has only a small number of electors and it is not practicable for the parish/community to be its own polling district.

2.12 In Scotland, each electoral ward must be divided into two or more polling districts unless there are special circumstances. Given the size of wards in Scotland, it is difficult to envisage what those special circumstances might be in practice.

2.13 When a parish or community is not a separate polling district or a Scottish electoral ward is not split into two or more polling districts, the special circumstances and the recommendation resulting from these should be clearly set in the review document for the council or relevant committee to consider.

Polling place

2.14 A polling place is the building or area in which polling stations will be selected by the (Acting) Returning Officer. A polling place within a polling district must be designated so that polling stations are within easy reach of all electors from across the polling district.

2.15 We are aware that some authorities designate the entire polling district as the polling place. However, Section 18B(4)(e) of the RPA 1983 states that 'the polling place must be small enough to indicate to electors in different parts of the district how they will be able to reach the polling station'. We therefore consider that polling places should always be defined more specifically than simply the polling district - for example, by designating the name of the polling place (normally a particular building or area and its environs).

Polling station

2.16 A polling station is the room or area within the polling place where voting takes place. Unlike polling districts and polling places which are fixed by the local authority, polling stations are chosen by the relevant Returning Officer for the election.

3 Scope of compulsory reviews

3.1 Polling districts and polling places for other elections are not automatically part of the compulsory review. However, as polling districts and polling places for other elections are based on UK Parliamentary polling arrangements, the requirements of any other elections that are held within the local authority area should be taken into consideration as part of the review. This means that although it is the (Acting) Returning Officer who is the primary Returning Officer for the purposes of the review and has a statutory role to participate in it, all Returning Officers within the constituency (if they are not also the (Acting) Returning Officer) should be involved in the review process.

4 Requirements of a review

Overview of the legislative requirements

Designation of polling districts and polling places

4.1 Local authorities must comply with the following legislative requirements regarding the designation of polling districts and polling places:

- each parish in England and community in Wales is to be a separate polling district, unless special circumstances apply
- in Scotland, each electoral ward must be divided into two or more separate polling districts, unless special circumstances apply
- the council must designate a polling place for each polling district, unless the size or other circumstances of a polling district are such that the situation of the polling stations does not materially affect the convenience of the electors
- the polling place must be an area in the district, unless special circumstances make it desirable to designate an area wholly or partly outside the district (for example, if no accessible polling place can be identified in the district)

- the polling place must be small enough to indicate to electors in different parts of the district how they will be able to reach the polling station

Accessibility

4.2 Local authorities must also comply with the following access requirements. As part of the review, they must:

- seek to ensure that all electors in a constituency in the local authority area have such reasonable facilities for voting as are practicable in the circumstances
- seek to ensure that so far as is reasonable and practicable every polling place for which it is responsible is accessible to electors who are disabled

4.3 The council must have regard to the accessibility to disabled persons of potential polling stations in any place which it is considering designating as a polling place or the designation of which as a polling place it is reviewing.

4.4 See also [‘Considering accessibility issues’](#) below.

Formal review process (Schedule A1 steps)

4.5 When carrying out the review, local authorities must:

- publish a notice of the holding of a review
- consult the (Acting) Returning Officer for every parliamentary constituency which is wholly or partly in its area
- publish all representations made by an (Acting) Returning Officer within 30 days of receipt by posting a copy of them at the local authority’s office and in at least one conspicuous place in their area and, if the authority maintains a website, by placing a copy on the authority’s website
- seek representations from such persons as it thinks have particular expertise in relation to access to premises or facilities for persons who have different forms of disability. Such persons must have an opportunity to make representations and to comment on the representations made by the (Acting) Returning Officer(s).
- on completion of a review, give reasons for its decisions and publish:
 - a. all correspondence sent to an (Acting) Returning Officer in connection with the review
 - b. all correspondence sent to any person whom the authority thinks has particular expertise in relation to access to premises or facilities for persons who have different forms of disability
 - c. all representations made by any person in connection with the review
 - d. the minutes of any meeting held by the council to consider any revision to the designation of polling districts or polling places within its area as a result of the review
 - e. details of the designation of polling districts and polling places within the local authority area as a result of the review

- f. details of the places where the results of the review have been published

Considering accessibility issues

4.6 Local authorities have a duty to review the accessibility of all polling places to disabled voters and ensure that every polling place, and prospective polling place, for which it is responsible is accessible to disabled voters 'so far as is reasonable and practicable'.

4.7 According to the Equalities and Human Rights Commission the duty to make reasonable adjustments comprises three requirements. For service providers and those exercising public functions, these requirements are:

- Where a provision, criterion or practice puts disabled people at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage.
- Where a physical feature puts disabled people at a substantial disadvantage compared with people who are not disabled to avoid that disadvantage or adopt a reasonable alternative method of providing the service or exercising the function.
- Where not providing an auxiliary aid¹ puts disabled people at a substantial disadvantage compared with people who are not disabled, to provide that auxiliary aid.

4.8 In the Scope 2010 report 'Polls Apart 2010: Opening elections to disabled people' it was made clear that access is still a barrier to some disabled people who want to cast their vote in person.

4.9 Below, are some of the main physical access issues identified by SCOPE, which should be considered as part of a review:

- polling places and stations with steps into the entrance, or otherwise inaccessible
- narrow doorways and corridors
- lack of space within the polling place that did not enable motorised wheelchair manoeuvrability
- lack of space and secrecy for the elector and their companion to discuss the elector's choice of vote
- lack of low level polling booths or booths/tables that didn't provide disabled voters with confidence that they could cast their vote in secrecy as they were positioned close to the polling station staff
- a lack of chairs to enable people to rest
- a lack of a clear display of guidance or aids (such as tactile voting devices) to enable people to feel confident about the process
- inadequate lighting

¹ In the context of a polling station, an auxiliary aid could, for example, be a ramp for wheelchair users.

4.10 These factors, and accessibility issues more generally, will also need to be considered by the Returning Officer as part of their training for polling station staff.

4.11 In [Appendix A](#) of this guidance we provide an accessibility checklist that can be used to assess the suitability of each polling place and polling station which covers these, as well as other issues.

4.12 In addition to writing to those groups or individuals the local authority has identified as having expertise in access issues, the authority should also engage any internal disability access group and/or disability officer as part of the review.

5 Planning the next compulsory review: 1 October 2018 – 31 January 2020 (inclusive)

5.1 Local authorities will need to decide when they are going to conduct the next compulsory review within the timescales provided by the legislation.

5.2 Even though the next compulsory review cannot start before 1 October 2018, local authorities can start planning for the review before then. There are also some preparatory steps, detailed below, which can be taken that fall outside the formal legal requirements of the review.

5.3 For example, local authorities may start compiling statistics and information which may assist them during the review. These may include:

- Electorate figures, broken down to street level within wards and existing polling districts.
- Any local authority or national statistics that estimate population change within the area.
- In England and Wales, a report from the authority's planning section detailing any proposed areas of new development and the approximate number of dwellings and expected population numbers for those areas. In Scotland, this information can be obtained from the Housing Land Audit.
- Detailed up-to-date maps of a scale that will assist in the designation of polling district boundaries.
- Details of current polling places and an indication as to their overall suitability for purpose (including, for example, any surveys, diagrams or photographs completed with the assistance of Presiding Officers or polling station inspectors or as part of a previous review or post-election evaluation). Further guidance can be found under [‘Assessing the current arrangements and proposals for change’](#).
- Any comments or complaints regarding the current arrangements from the public, elected members or other bodies.

- Up-to-date information gained from the existing and possible future polling station venue managers as to continued availability (highlighting, for example, planned renovation work or other future plans).
- Details of potential alternative buildings (public, private or temporary type constructions) that might appear suitable.
- Advice and guidance from local disability groups and disability organisations (such as, for example, SCOPE or Capability Scotland), and any expert help from officers within the council who are responsible for equality schemes.
- Terms of reference and the criteria for assessing the suitability of the current/proposed arrangements

5.4 Local authorities could also set the timetable for conducting the review. This may include booking the date of the council/ executive/committee meeting where the detailed review proposals would be formally considered.

5.5 The documents required to be published or communicated during the review, such as the notice of review and the letters to Returning Officers and those with expertise in disabled access, could also be prepared. However, the notice cannot be published nor the letters sent before 1 October 2018.

5.6 When planning for the review, the local authority will also need to identify who will lead and support the review, drawing personnel not only from electoral services but also from other parts of the authority who may have expertise to assist. Again, this can be done ahead of the start of the compulsory review period.

Carrying out a preliminary review

5.7 The local authority should undertake a preliminary review of the current polling districts and polling places with a view to establishing their suitability, and identify any potential alternatives where required. This may be done before the start of the specified review period.

5.8 There is no requirement to change any of the polling districts and polling places if they are suitable, but any 'no change' decision must be fully justified as part of the overall proposals.

5.9 The review process should be structured, and must be conducted formally with supporting documentation. This will ensure that there is a complete audit trail for all decisions taken and will contribute to the transparency of the process.

5.10 Close liaison with other departments of the council, such as communications, those providing services to disabled residents, and planning will help to increase the efficiency of the overall review process.

5.11 The local authority planning and property services departments, for example, will be able to provide guidance on the availability of locations and

premises and details of any residential developments that might have an impact on future electorate figures.

5.12 Modelling possible options where changes are deemed necessary can be undertaken by using mapping and planning tools available within the local authority, particularly as most authorities will now have access to GIS mapping services which can pull data from a variety of sources.

5.13 Local authorities should determine the most appropriate method of involving relevant local authority staff and other interested groups as appropriate.

Assessing the current arrangements and proposals for change

5.14 The legislation suggests an approach starting with polling districts, followed by choosing polling places and then considering polling stations. In practice, however, it is important that good quality polling places are identified first, which can then be used as part of the process of defining suitable polling district arrangements that comply with the requirements set out in the legislation. [Appendix A](#) provides template checklists to assist with the evaluation of current/proposed polling places and polling stations.

Polling districts

5.15 The following should be considered as part of the assessment of the suitability of polling district boundaries:

- Are the boundaries well-defined? For example, do they follow the natural boundaries of the area? If not, is it clear which properties belong in the polling district?
- Are there suitable transport links within the polling district, and how do they relate to the areas of the polling district that are most highly populated? Are there any obstacles to voters crossing the current polling district and reaching the polling place e.g., steep hills, major roads, railway lines, rivers?

Polling places

5.16 There are a number of factors that will need to be considered when reviewing existing polling places or when assessing new polling places, including:

- **Location:** Is it reasonably accessible within the polling district? Does it avoid barriers for the voter such as steep hills, major roads, rivers, etc.? Are there any convenient transport links?
- **Size:** Can it accommodate more than one polling station if required? If multiple polling stations are required, is the polling place capable of accommodating all voters going into and out of the polling stations, even where there is a high turnout?
- **Availability:** Is the building readily available in the event of any unscheduled elections? Is there any possibility that the building may be demolished as part of a new development?

- **Accessibility:** Is the building accessible to all those entitled to attend the polling place?

5.17 Ideally, there would be the choice of a range of fully accessible buildings, conveniently located for electors in the area within which to establish polling stations. In practice, however, the choice of polling places will often be a balance between the quality of a building (access, facilities, etc.) and the proximity of the building to the electors. When making a decision, all factors will need to be considered and the authority will need to be able to demonstrate their reasoning behind the decision.

5.18 Where, because of local circumstances, a polling place has been selected that is not fully accessible, then reasonable adjustments must be undertaken to provide access for all electors. Alternatively, the local authority should consider whether it would be appropriate to designate a polling place that falls outside the polling district.

5.19 Part of the decision-making process involves assessing if the polling place is capable of accommodating more than one polling station together with the necessary staff and equipment, particularly in circumstances where the number of electors allocated to a polling place is high. The number of electors allocated to a particular polling station should not exceed 2,500.

5.20 In instances where there may be a higher turnout, such as at a UK Parliamentary election, (Acting) Returning Officers may wish to set up multiple polling stations within the polling place. Consideration will need to be given to whether the size and layout of the area or building can accommodate such arrangements.

Polling stations

5.21 When assessing the suitability of a room or area for use as a polling station, the (Acting) Returning Officer should consider how the size and layout would allow for the most effective throughput of voters, including in those instances where there is a high number of electors in the polling station at any one time on polling day. Each polling station should be designed to provide suitable conditions for the elector to vote in private, for staff to conduct elections in an efficient and effective manner and for those entitled to observe the voting process to do so without compromising the secrecy of the ballot.

Use of schools

5.22 It should be noted that for the purpose of taking the poll in England and Wales, the (Acting) Returning Officer is entitled to use free of charge schools maintained or assisted by a local authority as well as those schools that receive grants made out of moneys provided by Parliament. This includes academies and free schools. In Scotland, the rooms in schools that can be used free of charge for the taking of the poll are those in schools that are not independent schools within the meaning of the Education (Scotland) Act 1980.

6 The review process

Stage 1 – Notification of the review

6.1 The formal commencement of the review requires the local authority to give notice of the holding of a review. The notice must:

- be displayed at the local authority's office and in at least one conspicuous place within the authority
- be published on the local authority website

6.2 Additionally, the authority could display copies in other public buildings and, in particular, those buildings frequented by disabled residents. The authority's disability officer should be able to give guidance on the most suitable places for reaching disabled residents.

6.3 The content of the notice is not prescribed, but should state:

- that the local authority is conducting a review of polling districts and polling places
- that the (Acting) Returning Officer will make a comment on proposed polling stations, and an indication of when and where the (Acting) Returning Officer's representations will be made available
- that electors within the authority or within a UK Parliamentary constituency which has any part in the authority may make a representation
- that the authority would welcome the views of all residents, particularly disabled residents, on the authority's proposals, the (Acting) Returning Officer's representation or any other matters
- that the authority would welcome any person or body with expertise in access for persons with any type of disability to comment on the authority's proposals, the (Acting) Returning Officer's representation or any other matters
- that persons or bodies making representations should, if possible, give alternative places that may be used as polling places
- the postal address, e-mail address and website address at which documents can be inspected and representations made
- an indication of the timetable of the review and a deadline for representations

6.4 The authority should also send a copy of the notice to interested parties such as elected representatives (Councillors, MPs, MSPs, AMs, MEPs, etc.), political parties, disability groups and other stakeholders. Additionally, the authority could issue a press release and use social media feeds to draw attention to the review and the process.

Stage 2 – Consultation

6.5 The consultation stage is for representations and comments to be made on the existing and proposed arrangements for polling districts and polling places. There are two aspects of this stage:

- A compulsory submission from the (Acting) Returning Officer of the UK Parliamentary constituency or constituencies, which must then be published by the local authority.
- Submissions from electors and other interested persons and bodies, including elected representatives and those with expertise in relation to access to premises or facilities for disabled people.

The (Acting) Returning Officer's submission

6.6 The (Acting) Returning Officer's submission must comment on both the existing polling stations and the polling stations that would likely be used based on any proposed polling places. The (Acting) Returning Officer's report must also contain information as to the location of polling stations within polling places. Completing the templates at [Appendix A](#) may help to form a basis for this report.

6.7 The local authority must publish the (Acting) Returning Officer's comments within 30 calendar days of receipt. The comments should be published at the local authority offices and in at least one conspicuous place within each UK Parliamentary constituency contained wholly or partly in the local authority area. They should also be published on the local authority's website. Additionally, the (Acting) Returning Officer's response could be copied and made available in council offices, libraries, community centres or other places where residents may visit.

Consultees

6.8 The authority should consult widely on the review and should seek out the views of interested groups or bodies, including electors, candidates and agents, political parties and members of the council, as well as other elected representatives (MPs, MSPs, AMs, MEPs, etc.).

6.9 It will be particularly important to consult with those who have specific experience of assessing access for persons with different disabilities. These could include disability sections or occupational health departments within the council, as well as local and national disability groups. The authority should give consideration to the different types of disability which may make voting in person more difficult, and should also consider the council's own policy on disabled access. Consultees should be asked for comment both in general and, if appropriate, about particular buildings or areas within the authority.

6.10 Any persons involved in the consultation have the right to comment on the recommendations proposed by the (Acting) Returning Officer.

6.11 Any elector for a UK Parliamentary constituency either wholly within or partly within the local authority area may comment on any of the recommendations within the whole local authority area.

6.12 Any person or body that makes a comment should be invited to suggest alternative polling districts/polling places and should be encouraged to give a reason for the alternative proposal so that it may be given appropriate consideration. As mentioned above, the notice published by the local authority should provide a deadline for the submission of comments.

Stage 3 – Concluding the review

6.13 After considering all of the representations, the local authority must decide on the most appropriate polling districts and polling places, which must be approved by the council.

6.14 If the review results in the alteration of one or more polling districts, the Electoral Registration Officer must make the necessary alterations to the electoral register. Depending on the timing of the review and the extent of the changes, the ERO has three options to ensure the register reflects the new polling districts:

- update the register on publication of the revised register following the conclusion of the annual canvass
- re-publish a revised register at another point in the year
- publish a notice of alteration

6.15 Where the Electoral Registration Officer has decided to revise their register by republishing it to incorporate the changes, the law requires that the ERO publish a notice 14 calendar days before the publication of the revised version of the register in a local newspaper, at their office and at some other conspicuous place or places in the area. The legislation does not allow for a part publication of the register – a revised register can only be published for the whole of the local authority area.

6.16 Any alteration is effective on the date on which the Electoral Registration Officer publishes a notice stating that the alterations have been made, which should be published at the same time as the register is revised or a notice of alteration published, as appropriate.

Stage 4 – Publishing the conclusions of the review

6.17 Once the council has agreed the proposals, details of the new polling districts and polling places must be made available to the public. These should be made available at the local authority offices, in at least one conspicuous place in the constituency (or constituencies), and on the local authority's website. The reasons for choosing each particular polling district and polling place must be given.

6.18 Along with the reasons for the final decision of the review, the following must also be published:

- all correspondence sent to the (Acting) Returning Officer in connection with the review
- all correspondence sent to any person whom the authority contacted because they had particular expertise in relation to access to premises or facilities for disabled people
- all representations made by any person in connection with the review
- the minutes of any meeting held by the council to consider any revision to the designation of polling districts or polling places within its area as a result of the review
- details of the designation of polling districts and polling places within its area as a result of the review
- details of the places where the results of the review have been published

6.19 It is important that electors are made aware of any changes made to the place they must attend to vote. For example, the poll card for the next election they are entitled to vote at could indicate if their station has changed.

7 The appeals process

7.1 Following the conclusion of the local authority's review, certain persons have a right to make representations to the Commission. If, on receipt of such representations, we find that a local authority's review did not:

- meet the reasonable requirements of the electors in the constituency, or a body of them, or
- take sufficient account of the accessibility for disabled persons of a polling station/ polling stations within a designated polling place

then we may direct the authority to make any alterations to the polling places that we think necessary and, if the alterations are not made within two months, we may make the alterations ourselves.

Who is entitled to make representations to the Commission?

7.2 The following may make representations:

- in England, any parish council which is wholly or partly situated within each constituency, or parish meeting where there is no such council
- in Wales, any community council which is wholly or partly situated within each constituency
- thirty or more registered electors in each constituency (although electors registered anonymously cannot make a representation)

- a person (except the (Acting) Returning Officer) who made representations to the authority when the review was being undertaken
- any person who is not an elector in a constituency in the authority's area but who the Commission thinks has sufficient interest in the accessibility of disabled persons to polling places in the area or has particular expertise in relation to the access to premises or facilities of disabled persons

7.3 In addition, the (Acting) Returning Officer may make observations on any representations made to us.

Format for all representations

7.4 All representations must be made in writing, either by post, e-mail or fax. The representation must be as specific as possible and should clearly state the manner in which it is alleged that the local authority has failed to properly conduct the review. There are only two grounds on which a representation may be made. These are:

- the local authority has failed to meet the reasonable requirements of the electors in the constituency
- the local authority has failed to take sufficient account of accessibility to disabled persons of the polling station/ polling stations within a polling place.

7.5 Representations based on any other premise will not be considered.

7.6 The representation should include the location of the polling place and any other relevant information regarding the polling place at issue, stating specifically why it is inaccessible or does not meet the reasonable requirements of the electors.

7.7 A representation may also include for consideration specific proposals for changing the place that has been designated as the polling place.

The decision-making process of the Commission

7.8 Upon receipt of a representation, we will request all relevant documentation from the local authority and will show the authority the representation.

7.9 The (Acting) Returning Officer is entitled to make observations on the representation submitted to us and should give a report on the polling station(s) which would likely be used should the representation be successful.

7.10 The documentation from the local authority, the observations of the (Acting) Returning Officer and any other relevant information will be taken into consideration, in conjunction with the representation.

7.11 We may seek advice from persons with expertise on accessibility issues when making our decision.

7.12 We will set out in writing our conclusions and the reasons for our decision. Our decision will be issued to the person(s) who made the representation, the local authority and the (Acting) Returning Officer. The decision and related documents will also be published on our website. Local authorities are advised to publish the outcome of the appeal in the same way as the results of the review were published.

7.13 We may direct the local authority to consider any alterations to the polling places that we deem necessary under the review. After two months, if the local authority has failed to make the alterations, we can itself make the alterations as if the local authority had implemented them.

7.14 Representations should be sent to:

Legal Counsel
The Electoral Commission
3 Bunhill Row
London EC1Y 8YZ
Tel: 020 7271 0500
Fax 020 7271 0505
Email: appeals@electoralcommission.org.uk

7.15 Further information on previous appeals, including the decisions made by the Commission can be found on [our website](#).

8 Making amendments to polling places outside of the compulsory review period and carrying out interim reviews

8.1 If a polling station becomes unavailable, the (Acting) Returning Officer should consider whether another polling station could be designated within the polling place. Changing the polling station within the polling place would not require a review.

8.2 If a building becomes unavailable before an election, the polling place can be changed by the local authority in accordance with their decision making arrangements. If delegation procedures are in place, for example to a committee of the council, these should be followed as set out in the council's constitution and the person or persons who are entitled to make changes to polling places should be contacted.

8.3 Between compulsory reviews, all polling places and polling stations used should be kept under consideration, and an evaluation of their suitability carried out after each election. If any changes are identified as being

desirable, the same steps should be followed as for conducting the compulsory review.

8.4 The council can carry out an interim review and change some of their polling districts and polling places before the end of the 5-year cycle, but the same processes should be undertaken for the affected areas as for the compulsory review. Without going through these processes, the council will have difficulty evidencing their decision making and explaining how they took into consideration the views of disabled persons and the reasonable requirements of electors.

Appendix A - templates

The following templates have been designed for use in evaluating the suitability of buildings as polling places and polling stations.

Part A – to be completed by the local authority with the details of the current polling places.

Part B – to be completed by the local authority to evaluate external areas' access and facilities both outside the perimeter of the building and within the boundary of the building itself.

Part C – to be completed by the local authority to assess internal access to the polling station, but excluding the polling station itself (i.e. covering the corridors leading to the polling station accommodation, but not the area in which polling will be carried out), and the facilities available within the building. Should the proposed building, room or area to be used as the polling station have direct access to the road/pavement or external parts, Part C can be excluded from this assessment.

Part D – to be completed by the (Acting) Returning Officer with the details of the area that is, or is likely to be, used as the polling station(s).

(If local authorities already have up-to-date detailed information to assist with the completion of Parts B, C and D, this can be inserted into the individual templates together with any diagrams and/or photographs to enable the building to be re-assessed on a site visit. The information should be verified as part of the visit.)

Part E – to be completed by the local authority with any comments or complaints received from stakeholders as part of the consultation exercise. Completion can provide evidence that the review considered the submissions as part of the formal evaluation process.

Any alternative proposals or suggestions put forward for new polling places/stations should be evaluated using the templates, and the results should be collated to facilitate the provision of appropriate feedback.

Polling place / polling station – evaluation checklist

Part A – Current polling place details		
Polling place identifier		
Polling place name		
Polling place address		
Number of electors (If more than one polling station within the polling place, identify split of electors)		
Building availability for future elections/referendums		
Polling place review		
Check	√	Comment
• Are there suitable transport links?		
• Are there any access issues regarding main/busy roads, railways, rivers, etc.?		
• Is the polling place capable of accommodating more than one polling station together with the necessary staff and equipment? If so, could it accommodate all allocated voters going in and out of the polling stations, even where there is a high turnout?		
• Is the building readily available in the event of any unscheduled elections?		
• Is there any possibility that the building may be demolished as part of a new development?		

Identify any complaints/comments received from stakeholders at previous electoral events

Date reviewed:

Officer initials:

Part B – External areas access and facilities		
Check	(√)	Comments
• Are there good public transport links to the polling place?		
• Is the approach to the building safe and free from obstructions and does it have a dropped kerb?		
• Is the building clearly identifiable?		
• Is additional signage required between street and entrance?		
• Is there the facility to put up the required signage for polling day?		
• Are there parking facilities for disabled people?		
• Are there parking facilities for polling staff?		
• Does the approach to the building have external lighting?		
• Does the building have level access? Yes/No. If no –		
• Has a purpose built ramp been installed?		
• If so, does it have a handrail?		
• Does the ramp have a gentle slope?		
• Does the building require a temporary ramp or is there an alternative disabled access?		
• Is the entrance door wide enough for a disabled person using a motorised wheelchair?		
• Are the doors light enough for frail/elderly voters to open?		
• Can the 'Guidance for voters' notice be clearly displayed outside the premises, as required by the election rules?		
• Are there any external security concerns?		
• Can tellers be accommodated outside the building?		

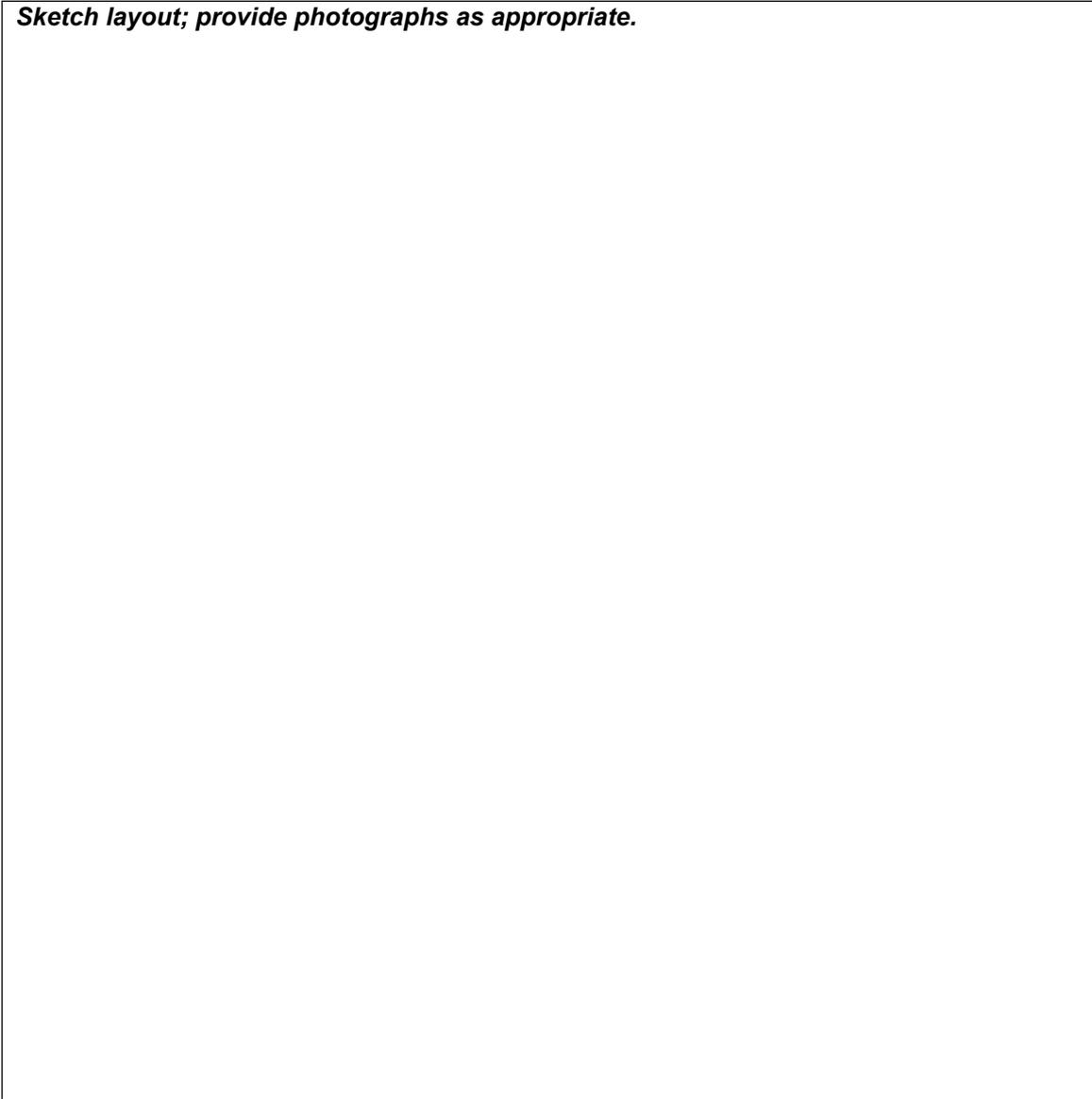
Date reviewed:

Officer initials:

External plan – B1

Show external layout, street name(s), car parking (including disabled car parking), ramps, steps, lighting, appropriate places for signage, etc.

Sketch layout; provide photographs as appropriate.



Date reviewed:

Officer initials:

Part C – Internal areas access and facilities		
Check	(√)	Comments
• Are all doors easy to open (including by wheelchair users) or do they need to be permanently locked back?		
• Are there any internal steps or obstructions/hazards?		
• Are any doormats level with the floor?		
• Is the floor covering non-slip (including in wet weather)?		
• Are there any corridors that may cause access problems?		
• Is there adequate lighting in the corridors?		
• Are there toilet facilities?		
• Is there a kitchen that staff can use?		
• Is the area adequately lit for day and night time?		
• Is there adequate space for signage?		
• How many polling stations can the building accommodate?		
• Does the building have a telephone available (land line) in the event of mobile network problems?		

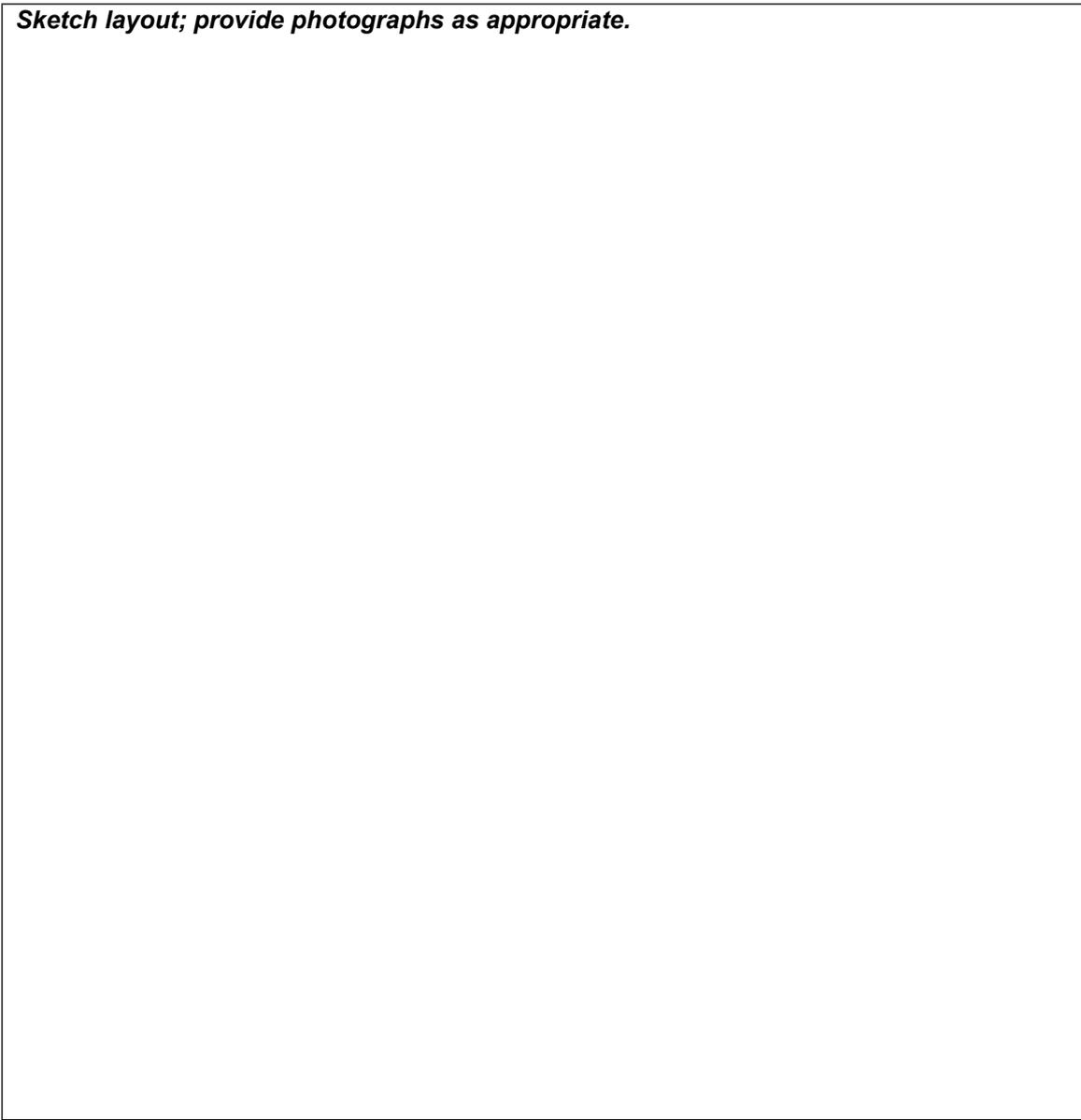
Date reviewed:

Officer initials:

Internal access leading to polling station(s) – C1

Show internal areas of the building, excluding the actual polling station where voting will take place, including corridors that link to the polling station, kitchen and toilets, and highlight any possible signage requirements and potential hazards. Also indicate door swing direction and ease of opening, any areas of poor lighting, and any areas of uneven floor, etc.

Sketch layout; provide photographs as appropriate.



Date reviewed:

Officer initials:

Part D – The polling station(s)		
Check	(√)	Comments
• Is there sufficient space to accommodate and manage the flow of a high volume of electors in the case of a high turnout of electors?		
• If multiple polling stations need to be provided, are there other rooms available, or can the space be clearly divided to provide adequate room for more than one polling station?		
• Is there sufficient space inside the polling station to comfortably accommodate staff, voters, polling agents and observers?		
• Could ballot booths be positioned in a way that would preserve the secrecy of the ballot, even where there may be a high volume of electors?		
• Is there adequate lighting for day and night time?		
• Is there suitable furniture (tables and chairs) available for all types of election for polling staff and for those voters who may need to rest?		
• Could motorised wheelchairs be accommodated?		
• Can the official notices be clearly displayed, including the large-print version of the ballot paper(s)?		

Date reviewed:

Officer initials:

Internal – The polling station(s) – D1

Identify the size and shape of the area available for polling. Include the position of the door(s), any windows and how the furniture and equipment should be laid out to accommodate all those entitled to be inside the polling station, taking into account access requirements for all voters, including those in wheelchairs, and demonstrating how the space should be used to ensure the most efficient flow of voters and the effective administration of the voting process.

Part E – Comments from stakeholders during consultation

Comment	Name/organisation	Response by (A)RO

Date reviewed:

Officer initials:

Additional comments from (A)RO