

Electoral Enrolment and Electoral Results quality assurance processes and controls

Management update

October 2025

Background

Following challenges experienced in the 2023 General Election, the Office of the Auditor-General (OAG) undertook an independent review that was released in May 2024. The report included recommendations to review quality assurance checks and enhance risk identification processes.

Part of the Electoral Commission Board's response to the Auditor-General's report was to commission PwC to provide further advice on the Electoral Enrolment and Electoral Results quality assurance and controls. The final report was received in March 2025 and made recommendations which built on the Auditor-General's recommendations.

The Commission appreciates the work and report completed by PwC. All recommendations have been accepted and have been used to prioritise improvements to risk management and quality assurance practices for the 2026 General Election.

Our response

The report articulates the challenge of maintaining a low risk tolerance in the face of an increasingly complex environment. The increased complexity results in more manual interventions and pressure on systems, processes that have significant complexity, are large in volume, require multiple controls and are largely manual.

The report noted that addressing the key drivers of risk requires change (including legislative change) across people, process and technology.

The report, alongside the OAG report, outlines areas that contribute to immediate improvements and recommends change that is longer term and multi-cycle.

Long term and legislative change were recommended but were not factored into PwC's assessment of residual risk. Short term improvements were recommended for the 2026 election.

The Commission has sought and received Budget funding to progress long term change. Legislation is progressing that will enable change. Short term improvements for the 2026 General Election are also funded.

Both short- and long-term responses are outlined in this update. These responses form a subset of work underway to address the Auditor-General's recommendations.

Strategic and long-term recommendations

The report recommends the Commission explore long term strategic changes to operating models used to deliver enrolment and election results.

Recommendation: Enable step change that fundamentally changes the volume and flow of enrolment activity across the electoral cycle, so the roll is more consistently accurate and complete, and less change is required during the election period

Recommended change	Update on progress
<i>Take steps to enable rolls to remain up to date during the electoral cycle</i>	Legislative change is progressing that, if passed, will in the future enable automatic enrolment updates to change of details for enrolled electors. This will shift a bulk of the most complex transactions out of the election period (defined as the 60-day period between issue and return of the writ). The use of digital channels to contact electors around enrolment status will increase the effectiveness of our enrolment communication as well the accuracy and completeness of the roll. A business case to explore options for future technology, including modernising interactions with voters, has been funded.
<i>As far as possible and feasible, take action to identify and reach unenrolled people, and electors whose information is not up to date</i>	
<i>Make it easy and transactionally simple for eligible voters to keep electoral information up to date and ensure the systems used to hold and support enrolment data enable these actions</i>	

Recommendation: Enable step change that fundamentally changes how the Commission uses technology to prevent errors from occurring and better detect whether errors have occurred by moving away from manual processes and controls

A business case to explore options for future technology, including assessing the benefits of election technology, has been funded.

Legislative considerations

Enrolment accuracy and completeness of the roll: Legislation requires prescriptive steps to be taken to update details on the roll and precludes the Commission from directly enrolling or updating details.

- Response: Proposed legislation enables automatic enrolment updates and removes the requirement to collate some non-essential elector information. Through process redesign, the Commission has identified more efficient targeting of assurance staff and controls to ensure integrity of enrolment updates during high volume periods.

Qualification and dual vote investigations: Legislation requires prescriptive steps to be taken to identify, assess and remove apparent dual votes from all electorates.

- Response: Changes to the dual vote settings were considered, however, the efficiency of the process must be balanced against public trust that the core principle of one person, one vote is protected and change was not favoured at this time. Assessment of these settings is best considered in a broader assessment of election processes as below.

Identifying and discussing the existing system settings: The report suggests a discussion of the impact of the legislative settings and detailed steps to ascertain appetite for change.

- Response: The simplification of core election settings and processes are expected to form a key input into the successful adoption of any election technology and therefore will form part of the inputs to a modernisation business case and programme.

Short-term recommendations

This section provides an update on the Commission's response to the remaining recommendations.

The detailed response by recommendation is outlined in **Appendix A**.

Work completed

The Commission has made a significant effort to complete several key activities (outlined below) which lay the foundation for future improvements. The Commission has:

- Developed a comprehensive programme of integrity and efficiency improvements and sought funding through Budget 2025 to support this work
- Proposed legislative changes to support a modernisation programme including automatic enrolment updates to reduce pressure on the system
- Developed and is implementing an Enterprise risk management framework including holding workshops and training with leaders and teams involved in election delivery
- Improved several checks and controls, including improvements to the entering of results, which were in place for the Tāmaki Makaurau by-election
- Developed process maps for enrolment through to the return of results in a general election

- Designed and approved a Risk Management Operational Framework and Risk Management Policy.
- Recruited additional risk and assurance staff
- Completed a review of quality assurance checks, new quality assurance sampling has been introduced, and new dashboard developed for monitoring transactions
- Made changes to the way results are recorded and monitored in our system and introduced additional change controls.

Next stages

The next stage of our workplan includes:

- Key controls monitoring (including evidence of completion) will be designed and tracked as part of the governance structure
- Tolerance levels will be designed and implemented
- Several system changes to increase visibility, efficiency, accuracy, and monitoring completion of critical activities
- Increased staffing to support the completion of processing and the operation of quality checks
- A dashboard for monitoring the completion of key activity is being designed for the 2026 General Election
- Testing, training and implementing changes as we plan and prepare for the election.

Recommendations that have been considered and discounted or deferred

Some recommendations were considered and discounted or deferred.

Explore ceasing the split vote count

- Testing indicated limited benefits in not doing the split vote count. The split vote count also acts as an additional check against the accuracy of the special vote count.

Legislative changes to dual votes processes to enable resources to be directed to the electorates with margins within a set tolerance

- The change proposed goes to the core design principles of the electoral system and was not favoured at this time. The Commission is exploring options to improve the dual vote investigations including targeting of additional resource to support the process at key points and improved instructions to guide decision making.

Controls recommendations

- Several recommendations relate to strengthening or introducing audit trails or other data records to capture key decisions made through core systems (Electoral Management System (EMS) and Electoral Roll Scrutiny Application (ERSA)). When scoped, these required system changes that are not possible in this cycle. These changes will be considered as part of the system development pipeline. Alternative

controls for this cycle have been developed, such as changes to strengthen data transposition, and are set out in **Appendix A**.

Appendices

A: Responses to PwC recommendations

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PwC Recommendations	Management response / Updates
Governance, risk and controls (GRC) overview	
GRC overview 1 - Complete good practice process mapping and documentation (as per OAG rec 3) - Define the key controls that must operate- process steps with the biggest impact - Monitor operation and completion of key controls and capture clear and robust evidence that controls have been completed - Complete independent sample-based checks of control activity	- Process maps for enrolment through to the return of results have been largely completed. Once improved controls are finalised and tested, the maps and associated controls documentation will be completed. - Key controls will be identified and defined. - The focus for this GE cycle is on the critical election processes and key points of reliance on other systems. Monitoring of key controls, including evidence of completion, will be designed and monitored as part of the GE 2026 governance structure. - A Commission assurance plan has been developed which includes sampling and validation of control effectiveness. Additional resource in the assurance team is in place to validate efficacy of new controls as they are designed and tested.
GRC overview 2 Set enterprise and operational risk management expectations, tools, and governance. Consider alignment with appropriate risk standards such as ISO31000 Detail: Update and roll out Enterprise Risk framework including: - guidance and templates for measuring and assessing risks - identifying key risks - agreeing appetite and tolerances - governing and overseeing risk management	- A Risk Management Operational Framework and policy aligned to ISO31000 was approved by the Board in April 2025. - A programme of work is underway to increase the Commission's risk management knowledge and practice. - Priority is being given to our operational delivery areas (including enrolment and post-election).

PwC Recommendations	Management response / Updates
GRC overview 3 : Set risk tolerance for key risks to process, set and define key controls that must operate: Detail: - Continue to review and update process documentation and operational manuals including linking key controls to existing process manuals and guidelines - Introduce review and self-assess controls readiness in advance of a General Election - Introduce periodic risk-based controls assurance to validate that targeted controls have operated as expected	- Key process risks and key controls definition is underway. - Identification of the key process risks will inform criticality and tolerance levels. - Election tolerances will be finalised following operational simulation. - Risk tolerance for key areas will be explored and agreed shortly with the Board. - Controls were tested and assessed (including three new controls) during the Tāmaki Makaurau by-election.
GRC overview 4: Monitor operation and completion of key controls and build proactive assurance processes to validate compliance	- Existing enrolment dashboards have been reviewed; additional monitoring dashboards including enrolment variance and roll cleansing are in design. - Control activity dashboards will monitor completion across the election period including post-election. - Design of assurance activity includes validation. - Independent sampling of effectiveness of controls is included in the assurance workplan.
Enrolment recommendations	
PwC Electoral Enrolment (EE) overview <i>Introduce ‘preventative and early detect’ controls to confirm no one has accessed or changed restricted data outside of expected processes and that access remains restricted to only those who have an appropriate need through proactive review</i>	- An improved onboarding and offboarding process has been designed, supplemented by regular review to ensure people have the correct access. - A regular access review is included in the Enrolment Quality Assurance plan.
EE overview <i>Address preventative and early detect controls to:</i> - Deprioritise lower risk transactions in the TSR queue - Make it easier to detect errors which may have an impact and prioritise those checks.	- Changes are planned to a critical enrolment control (TSR) to prioritise high impact transactions and alert staff to higher risk transactions needing intensive review. - TSR changes will be supported by a changed staffing model to ensure that the skill and training of the enrolment teams match the most complex, high-risk transactions during high demand periods.

PwC Recommendations	Management response / Updates
Continue with TSR or introduce other significant risk mitigation steps	
EE overview <i>Introduce oversight, detect and mitigate controls:</i> Create a playbook for how enrolment responds to issues identified which scopes how to respond to different types of issues and how to ascertain what type of issue is occurring	A plan is being finalised, including scenario plans with response triggers and actions identified.
EE overview <i>Address oversight, detect and mitigate impact control gaps to:</i> - Review roll cleanses scope and see if there are further risks that are not managed by existing scope that could be addressed by a roll cleanse or new audit process - Capture evidence of key controls and their efficacy - Develop monitoring that clearly explains the operation of key controls, reducing the gap on mitigation.	- A quality and integrity work plan has been developed to ensure that adequate oversight of controls is in place. This includes: - a new dashboard developed for monitoring transactions - a new sampling and quality assurance process - current roll cleanses have been reviewed, potential new cleanses tested and further options to maximise the benefits of proposed legislation changes are being scoped - a controls review has been undertaken, and new controls are in the design phase. e.g. controls over management of potential duplicate records - increased staffing is planned to support the completion of processing and the operation of quality checks. - Critical process controls are being identified and monitoring approach designed
Enrolment detailed findings note -the following summarises actions across the detailed enrolment recommendations to remove repetition.	
Enhance Quality Assurance (TSR) The Transactions Status Report (TSR) is a key control for enrolment quality and requires improvement	- The processes and use of TSR has been reviewed. System changes are being made to increase efficiency of TSR by: - improving criteria for where TSR is required - adding filters to the system views used during data entry to better identify and manage backlog - developing alerts to identify changes most likely to cause error

PwC Recommendations	Management response / Updates
	○ collecting better information at decision points, and ○ preventing self-review. • A changed staffing model is being designed to ensure that the skill and training of the enrolment teams match the most complex, high-risk transactions during high demand periods. This enables TSR to be completed over the critical transactions. • Technical changes to improve data accuracy prior to TSR are also being implemented
Enhance Quality Assurance - controls Embedded QA controls are missing or not fully effective for key risk areas meaning process delays or errors impacting the completeness, accuracy, validity and security of the roll may not be identified and corrected.	• A review of quality assurance checks was undertaken and a new dashboard developed for monitoring transactions. • A new sampling and quality assurance process has been introduced. • Current roll cleanses have been reviewed, potential new cleanses tested and further options to maximise the benefits of proposed legislation changes are being scoped. • A controls review has been undertaken, and new controls are in the design training phase. Training focus will be shifting from completing forms to data literacy to improve data decisions that are made prior to TSR and reduce high risk errors. • A controls review has been undertaken, and a number of new controls are in the design phase. e.g. changed controls over the management of potential duplicate records. • An audit of the roll completeness is included on the Commission's assurance plan • Completed review of existing dashboards. Additional variance dashboards are being designed to see planned transactions vs actuals. A roll cleansing monitoring dashboard will be developed to identify and track anomalies, checks and corrections. A control activity dashboard will monitor completion • New quality assurance approaches and standards are being captured in a quality assurance plan. • Audit of the roll and sampling of effectiveness of controls is included in the Commission's Assurance workplan
Enhance Quality Assurance - system access	• a monthly review of system access will be implemented.

PwC Recommendations	Management response / Updates
Enhance Quality Assurance - make it easier to detect errors	- Processes have been assessed to identify triggers of error and solutions and controls designed to address this including: - adding filters to the system views used during data entry to better identify and manage backlog - developing alerts to identify changes most likely to cause error - designing improved training for permanent processing staff around data management.
Enhance Quality Assurance Monitor progress against the expected path, develop playbook to manage issues	- Monitoring of progress will occur through key milestone monitoring. - An incident management playbook is scheduled for development.
Enhance Quality Assurance - reduce volume Processing electoral roll changes that don't have a bearing on an individual's right to vote adds additional cost and stress to the early stages of the electoral results process As part of broader strategic considerations, investigate whether it may be possible to relax the requirement for the Electoral Commission to record non-mandatory data, or to deprioritize its capture and quality assurance over it to outside the busy electoral period	- Proposed legislation change if passed will change enrolment and data requirements such as not requiring honorifics and occupation. - TSR changes are identified to prioritise the critical changes during the election period. - Systems changes are planned to focus quality assurance on the remaining mandatory data. - This change will be strengthened by improvements to the business processes used by the team to triage and prioritise the way data is captured and processed. - We are also looking to implement automatic processing of straightforward enrolment updates where the elector verifies their identity online using their NZ passport, driver licence or RealMe ID – for example, an existing elector updating their address when they move house- that meet certain acceptance criteria.

PwC Recommendations	Management response / Updates
Electoral Results (ER) Recommendations	
ER Overview 1: Introduce <i>'preventative and early detect'</i> controls to monitor system records to confirm no one has accessed or changed restricted data outside of expected processes and that access remains restricted to only those who have an appropriate need through proactive review	System changes have been made to improve audit trails and raise the visibility of changes made to results data and records of decisions made in the Electoral Management System (EMS), including increased auditability of results changes.
ER Overview 2: Address <i>'preventative and early detect'</i> control gaps to: - reduce the complexity of the post-election process as far as possible - complete full scenario testing of end-to-end processes and scenario-based stress testing	- Changes have been made in EMS to lock down results ahead of QA. - System enhancements to reduce the complexity of post-election have been identified and are in design. - Scenario testing is planned as part of operational delivery simulation.
ER Overview 3: Introduce <i>'oversight, detect and mitigate'</i> controls - Monitor progress against the expected path - Create plans/playbooks	- System changes and control documentation updates are under development to improve: - monitoring completion of critical activities and controls - monitoring accuracy and appropriateness of activities and controls. - Monitoring dashboards are planned for GE2026 showing progress on key activities such as apparent dual votes investigations. - System changes to improve visibility of key steps in the official count have been designed, including changes to improve issue management and improve data entry warnings
ER Overview 4: Address <i>'oversight, detect and mitigate impact'</i> control gaps: - Make it easier to detect errors at key points where they are most likely - Change the way changes to count data is managed in EMS when corrected - Capture evidence of key controls operating	- Analysis of control gaps identified through 'lessons learned' and risk and control analysis is complete. - Specific improvements have been made to the controls in the Election Management System (EMS) that make it easier to detect potential errors including: - making it possible to identify differences between the preliminary and official counts earlier, during the data entry activity

PwC Recommendations	Management response / Updates
	○ making it easier to identify and manage issues using a new issues management screen, which also raises overall visibility of the number of errors to be resolved and how this is progressing. • Key controls operating effectiveness will be included in process documentation and an Operations Group focused Risk and Assurance Implementation Plan
Electoral results detailed findings	
ER1: Complete planning and testing to prove planned activities can achieve reasonable and worst-case scenarios. Actively monitor the expected path and be prepared to mitigate challenges which arise	• Scenario planning activity is to be included in the Operational Delivery Simulation testing and dress rehearsals. • New dashboards covering post-election activities are being planned for the 2026 General Election. • Issues escalation, thresholds for contingency actions, and monitoring of the expected path were trialled in the Tāmaki Makaurau by-election.
ER2: Reduce complexity in the process where possible, including reducing the possible ways that things can go wrong, by “locking down” the results so quality assurance corrections can be monitored and managed	• Process complexity is being considered with system changes planned. Some changes to enrolment processes and voting place activities that cause downstream complexity in the official count period have been identified. • Functionality has been built to lock down results and improve auditability where decisions have been made to change results data during quality assurance. • Further audit logging/trailing activities were considered but were unable to be implemented for this cycle. These will be considered for development in the following election cycle.
ER2: Reduce likelihood of failing to detect errors by reviewing processes at risk of data transposition errors	• Controls related to data transposition were tested during the Tāmaki Makaurau by-election. They were used during the preliminary count (undertaken during election day and night) and during the official count. These included: ○ separating duties for sorting votes, checking and count ○ double checking of count data entry ○ using headset splitters to enable two people to receive the call of results one to record, and one to check ○ additional checks of data entry of results into EMS.

PwC Recommendations	Management response / Updates
ER2: Make technology changes so that changes to results in Election Management System are able to be tracked and reconciled back to corrections or approvals	• Functionality has been built to reconcile changes to the decisions made.
ER3: Define the key controls that must operate. Capture clear and robust evidence that controls have been completed. Build digital dashboards to show current control completion, and provide confidence to senior leaders that key steps have been performed as expected	• Documentation outlining the key controls and evidence of completion that must operate is in progress. • Monitoring of control completion was trialled during the Tāmaki Makaurau by-election. • Dashboards are planned.
ER4: Investigate simplifying the Official Count process. Investigate ways to improve accuracy of manual data entry. Investigate ways to reduce reliance on phoned-in results	• Options have been considered to simplify processes. • Some options have been discounted (split votes, scanning) as level of effort or system changes required will outweigh the benefits or because the process supports procedural integrity (e.g. split vote counting provides a basis for assurance around accuracy of the count of special votes). • New manual controls for the count of preliminary and official votes were tested during the Head Quarters Test on 17 July 2025. The changes relate to reducing risk of error through modifying process steps during the sort and count of votes and the recording of results. These were trialled during the Tāmaki Makaurau by-election. • System improvements have been built to: ○ enable electorate managers to more easily identify and manage issues with their results ○ make it easier to extract dual votes and post-Writ changes through a new extraction screen ○ improve final certificate checks. • Quality assurance design options include improved checks by regional teams and consideration of targeted resources for close electorates. • The special votes qualification process will be streamlined if proposed legislation change is passed.