

7. Post election reports, such as the Report of the Electoral Commission on the 2023 General Election and the Controller and Auditor General Report: General Election 2023: Independent Review of Counting Errors, mention the long hours that staff were working in the lead up to the election, election day and post-election periods.

Review and Draft Update to the HSW Guardrails

8. After the start of the current Health, Safety, Wellbeing and Security Lead in 2024, a draft review of the guardrails was developed. This review included:
 - research and guidance on the health and safety risks the guardrails are designed to mitigate
 - draft proposed updates to the guardrails
 - draft proposed recommendations for additional guidance, processes, policies and procedures to support the guardrails.
9. The draft review and recommendations were shared with stakeholders from around the organisation, information sessions were held, and feedback was sought. A summary of this feedback can be found in the report in **Appendix A: Review of the General Election 2023 Health and Safety Guardrails**.
10. From the feedback received, the draft updated guardrails were re-evaluated and changes made before final recommendations were made to ELT. ELT approved the name change to Te Kauhanganui Critical Controls and endorsed Te Kauhanganui Critical Controls to go to the Board for approval on 1 July 2025. ELT also requested a workplan be developed for the Kete of Controls to support the management of fatigue, particularly on Election Day.

Discussion

Te Kauhanganui Critical Controls

11. It is recommended that the focus for Te Kauhanganui Critical Controls should be on fatigue risk management. The critical risk associated with fatigue being driving while fatigued leading to a crash causing injury, illness or death.
12. It is recommended that the other GE23 and draft proposed updated guardrails be removed from Te Kauhanganui Critical Controls and included in programmes of work for managing these risks. This is not to say these risks are not critical, nor that work would cease to ensure they are adequately mitigated. These programmes of work can be found in **Appendix A**.
13. Below are the recommended Te Kauhanganui Critical Controls:
 - Kaimahi will work no more than 6 out of 7 days.
 - This is to ensure that staff are taking at least one day's (24 hours) break per week.
 - Kaimahi will work no more than 12 hours in one shift.

- This would also be to work no more than 12 hours in a 24-hour period if doing split shifts.
- Due to the operational and financial constraints this critical control creates (as described in the feedback section above), discussion should be had around, and a decision made, as to whether there should be an exemption to this guardrail on election day.
- As part of this discussion, consideration should be given to weighting the operational risk against the risk that some kaimahi may still be driving after having worked 16+ hour days.
- To support this exemption, the Te Kauhanganui Critical Controls Kete of Controls workplan in **Appendix B** has been created. This workplan is to develop the kete of controls for use during the election period and on Election Day to support Te Kauhanganui Critical Controls and the management of fatigue from long working hours. Wherever possible, the aim would still be to keep kaimahi under the 12-hour limit.
- Kaimahi will have a 12-hour break between shifts.
 - This would not apply to the time between split shifts in a single day.
- Kaimahi will have regular breaks (10 minutes / 30 minutes, in accordance with legal requirements).

Out of scope

Next steps

15. Embed Te Kauhanganui / HSW Critical Controls into documentation, planning and training.
16. Start work on kete of controls workplan for Regional and Electorate Managers to use during their planning.

Appendices

- A: Review of the General Election 2023 Health, Safety and Wellbeing Guardrails
- B: Te Kauhanganui Critical Controls Kete of Controls Workplan

Draft HSW Guardrail Update Recommendations

From the information reviewed about the GE2023 HSW guardrails, the information from the February workshop and the regulator and industry guidance, the following draft updates to the HSW guardrails were developed.

- We will work in at least pairs whenever practicable when public-facing or have lone worker processes in place to monitor employee safety.
- All public-facing staff will have the information, training, instruction or supervision required to deal with incidences of violence and/or aggression.
- No one will work more than 50 hours in a week.
- No one will work more than six consecutive shifts without a 24-hour break.
- No one will work more than 12 hours in a shift.
- Workers will have a 12-hour break between shifts.
- Workers will take regular breaks (10 mins/30 mins in accordance with legal requirements).
- Remove the guardrail around hours driven. If the guardrail for fatigue is in place, no one should be driving beyond their work hours (except potentially to get home). If the guardrail for work hours is lowered to 12, then this will also bring driving hours in line with that required for other driving classes.
- All employees who drive for work will be fully licensed.
- All vehicles will be warranted and licensed to be on the road.
- All employees who drive for work will have completed a driving induction module.
- Leaders will have structured wellbeing conversations with their people on a regular basis.

Out of scope

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Fatigue

- Development of guidance for people leaders on identifying and managing fatigue and fatigued workers
- Development of exemption guidance and escalation processes for exceeding maximum working hours or days
- Development of accountability and monitoring processes
- Explore options for ensuring that no work is conducted during the early hours of the morning (12am-6am) when there is a circadian low and people are sleepest, most error-prone and least functional

Out of scope

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Feedback on working hours

The biggest feedback was regarding the negative impact that the proposed HSW guardrails for working hours would have on the ability of the Electoral Commission to deliver the election. This is due to the legislative requirements to perform certain tasks, on certain days, within certain

timeframes and the ability to recruit and maintain sufficient levels of kaimahi and associated cost incurred if further kaimahi were required to meet these requirements.

These were some of the specific areas of concern.

- Ability to meet the hours on election day.
 - Voting places are legislated to be open for certain periods 9am-7pm. The voting place manager must be present for this period, therefore there is only two hours outside of this period if they are required to stay under the 12-hour period. This includes time for set up, the count and reconciliation.
 - The voting place manager (VPM) usually starts at 7am and finishes in the voting place at approximately 8.30-9pm before returning materials to headquarters or a hub. They may then wait an hour or more as materials are returned before being able to leave, finishing at approximately 11pm, a 16-hour day. This may be longer for large or busy voting places, VPMs who struggle with the count or reconciliation or if there are delays at electorate headquarters.
 - Electorate managers also need to work the above hours to be available to VPMs. They then pack up the headquarters after all materials are returned, finishing at approximately midnight if there are no delays.
 - Meeting the 12-hour requirement on election day would require:
 - two electorate managers per electorate (or a deputy who can step in and work part of the election day)
 - two voting place managers per voting place
 - additional kaimahi in voting places and electorate headquarters to ensure everyone stays under the 12-hour limit.
- The 50-hour weekly limit.
 - There is variation week on week in the hours required, dependent on the tasks that need to be completed in the lead up to the election, some of which are legislated to be completed by certain dates. A 50-hour limit would make it hard to meet required tasks in high workload weeks.
 - This limit would only affect certain roles. As a large proportion of the temporary workforce only work on election day, this limit would not make a difference to managing fatigue for them. Other roles, such as Electorate Managers, may be significantly affected in their ability to meet their duties at peak times by this limit.
- The ability to recruit and maintain appropriate levels of kaimahi to meet the above requirements to keep everyone under the 12-hour limit. This is a significant constraint. In certain areas, ability to recruit the required number of kaimahi for voting places and electorate headquarters can be a challenge as it is, so the need for additional kaimahi will create a significant challenge. There would also be a financial cost associated with the requirement for extra kaimahi.
- A significant proportion of the election workforce only works on election day and does not have the risk of accumulated fatigue from working long hours over multiple days or

weeks. Workers may, however, have other employment or medical conditions that could contribute to their fatigue levels on this day that will still need to be managed.

- Not all roles are required to drive for work. As injury or illness caused by a crash due to driving fatigued is the main health and safety risk associated with the long hours, this risk is not applicable to all kaimahi. There are ways other than working hour restrictions to mitigate this risk, e.g., staying at hotels, family members or friends picking up workers, using taxis or Ubers etc. Despite not all workers driving for work, many would still be driving to and from work, so there would still be reputational risk if a worker were to crash on their drive home from a very long day/long week and for this to be associated with fatigue from working hours.

Concerns were also raised about a 'one size fits all approach' to the management of fatigue across a diverse, short-term workforce. A kete, or basket, of controls which electorate and regional managers could draw from to implement according to the needs of their areas was a favoured approach.

Such an approach, whilst not reducing the working hours of all kaimahi on election day, would enable a more flexible approach to the management of fatigue. There would still remain some kaimahi working, and potentially driving, after the 12-hour point. It would also require strong planning and leadership by regional and electorate managers to ensure that the health and safety of kaimahi was prioritised.

These are some of the ideas discussed during the Voting Services workshop that could form part of a kete of controls for fatigue management.

- Hubs where materials can be dropped to bring down the driving distance for VPMs.
- Roving mobile support to help with kaimahi breaks or other issues.
- Pick up of materials at the end of the night in certain areas, e.g., rural areas with long driving distances.
- VPMs setting up the night before wherever possible.
- VPMs who work election day do not work in the advanced voting period/day before election day.
- Deputy Electorate Managers who can provide support that allows electorate managers to take days off (especially in the week before election day) and start later on the day before election day.
- Ensuring voting place and electorate managers do not work the day after the election.
- Large or busy voting places have two voting place managers, or a second manager who starts later in the day.
- Potentially having a cut off time for the preliminary count or reconciliation if VPMs are struggling or have long drives to drop off materials.
- Ensuring roles where there are large amounts of driving, e.g., mobile support, do not work over the 12-hour limit.

Some of these ideas are already currently used in parts of the country, e.g., hubs and material pick up at end of the night. Others require further investigation into their viability. These would also be supported by the guidance and resources already recommended to be developed for kaimahi and people leaders on identifying and managing fatigue. Wherever possible, the aim would still be to keep kaimahi under the 12-hour limit.

This option would require a workplan to be developed to explore all of the controls to be included in the kete, their viability and application. This would also require electorate and regional managers to put in significant planning for health and safety and where such controls will be applied, e.g., in large, or busy voting places or rural voting place. This should be documented, e.g., incorporated into electorate plans.

Out of scope

[Redacted content]

The below are the recommended updated HSW guardrails.

- Kaimahi work no more than 6 out of 7 days.
 - This is to ensure that kaimahi are taking at least one day's (24 hours) break per week.
- Kaimahi will no work more than 12 hours in one shift.
 - The recommendation would also be to work no more than 12 hours in a 24-hour period if doing split shifts.
 - Due to the operational and financial constraints this guardrail creates (as described in the feedback section above) discussion should be had around, and a decision made, as to whether there should be an exemption to this guardrail on election day.
 - As part of this discussion, consideration should be given to weighting the operational risk against the risk that some kaimahi may still be driving after having worked 16+ hour days.
 - If such an exemption were to be agreed upon, a workplan to explore and develop a kete of controls for Regional and Electorate Managers to use should be created (as mentioned in the section on feedback, above) and supported by the guidance, escalation and exemption processes recommended to be developed (see section, below). Wherever possible, the aim would still be to keep kaimahi under the 12-hour limit.
- Kaimahi will have a 12-hour break between shifts.
 - This would not apply to the time between split shifts in a single day.
- Kaimahi will have regular breaks (10 mins/30 mins in accordance with legal requirements).

Recommendations for HSW programmes of work

To support the updated HSW guardrails, and in the case of guardrails which are recommended to be removed, the following programmes of work are recommended to develop guidance, processes, policies or procedures to manage the health and safety risks.

Fatigue

- Exploration and development of a kete of controls for fatigue risk management for use by Regional and Electorate managers.
- Plans for the management of these risks to be incorporated by electorate managers into their planning for their specific areas, recorded and monitored.
- Development of guidance for people leaders and kaimahi on identifying and managing fatigue and fatigued workers.
- Development of exemption guidance for exceeding maximum working hours.
- Development of planning and escalation processes for exceeding maximum working hours or for when weekly hours are escalating beyond 50 hours, especially for kaimahi that do not complete timesheets.

- Development of accountability, reporting and monitoring processes.

Out of scope

-
- | Response | Percentage |
|---|------------|
| Yes, the current administration is responsible | 85% |
| No, the current administration is not responsible | 15% |

- [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

114

-

- [REDACTED]
 ■ [REDACTED]
 ■ [REDACTED]

Appendix 1: Guidance and Research on Managing Fatigue

WorkSafe New Zealand describes fatigue as ‘a state of physical and/or mental exhaustion.’ It can reduce a person’s ability to perform work safely and effectively. Fatigue reduces alertness. This may lead to errors, and an increase in workplace incidents and injuries (WorkSafe, 2017).

Risks associated with fatigue includes:

- workers becoming fatigued leading to chronic mental or physical injury or harm
- workers becoming fatigued leading to accidents whilst driving causing injury or death.

There are various causes of fatigue, some of which are interrelated. These include work scheduling of hours or work, night work and shift work. Beyond work, there are numerous non-work causes of fatigue that kaimahi may bring to work, these include sleep apnoea, medications and poor sleep due to factors such as street noise or family demands (WorkSafe, 2017).

Fatigue can be separated into three types: acute, cumulative or circadian.

- Acute fatigue typically results from an extended period of wakefulness that exceeds 16 hours.
- Cumulate fatigue results from an accumulation of suboptimal sleep length, or times.
- Circadian fatigue arises from shifting of the sleep/wake cycle, due to changes in working hours or travel. (LA Trobe University, 2024).

There are three categories of fatigue: physical, mental and emotional, which can combine or occur separately.

- Mental fatigue consists of significant mental exhaustion which can reduce a person’s ability to engage in cognitive activities.
- Physical fatigue consists of significant physical exhaustion leading to a reduced ability to do physical activities, such as manual labour.
- Emotional Fatigue consists of significant emotional exhaustion, leading to a reduced ability to undertake emotional activities such as empathising with or caring for others (WorkSafe Victoria, 2020, LA Trobe University, 2024).

Short term effects of fatigue include (Port Health and Safety Leadership Group, 2022):

- excessive yawning, feeling drowsy, micro-sleeps or falling asleep at work and a need for extended sleep during days off work
- short-term memory problems
- an inability to filter out distractions and to concentrate
- finding it harder to interact with other people, harder to communicate and becoming withdrawn and feeling disengaged
- poorer decision making and judgement
- blurred vision or impaired visual perception, reduced hand-eye coordination or slow reflexes
- risk taking behaviour
- changes in behaviour, e.g. arriving late to work or taking more days off, including sick leave
- feeling unusually wired or hyped, or lack of emotional control, e.g. behaving aggressively or becoming easily upset
- headaches or dizziness
- feeling disengaged.

Long term effects of fatigue include (WorkSafe Victoria, 2020):

- heart disease
- diabetes
- high blood pressure
- burnout
- depression
- anxiety
- negative effects on existing health issues
- reduction in effectiveness of medications
- potential link to some cancers.

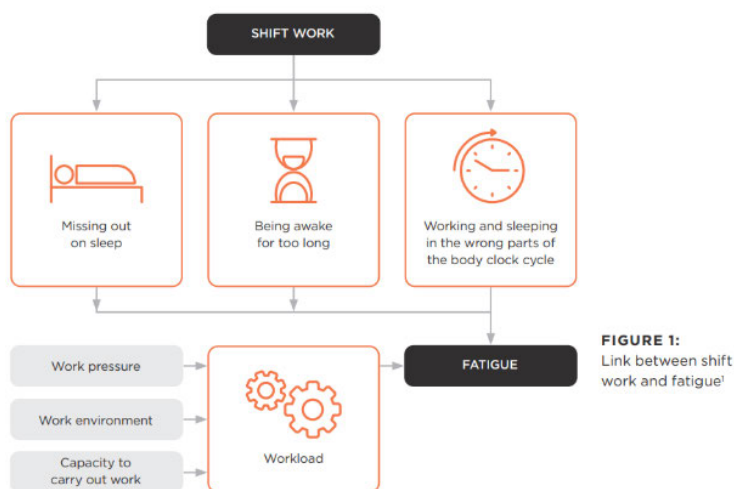
As can be seen above, there are numerous effects of fatigue that workers can experience. All workers also experience fatigue slightly differently and may not have the same symptoms. These symptoms might not be obvious from the outside or to the worker themselves. (Port Health and Safety Leadership Group, 2022).

Work Arrangements

Work requirements can impact upon all three types of fatigue. This can be because of numerous reasons, including missing out on sleep, being awake for long periods of time, working and sleep out of sync with the circadian body clock or demanding mental or physical work (Port Health and Safety Leadership Group, 2022).

WorkSafe NZ considers any type of work that requires a worker to be awake when they would normally be asleep to be 'shift work' and that this work is a cause of fatigue (WorkSafe, 2021). As the below figure shows, there are numerous factors that contribute to fatigue. These include missing sleep, or 'sleep debt', long hours of wakefulness, workload and sleeping in the wrong part of the circadian body clock.

Figure 4: Link Between Shift Work and Fatigue (WorkSafe, 2021)



¹ Sleep/Wake Research Centre, School of Health Sciences, College of Health, Massey University.

Sleep Debt

When workers miss out on getting enough hours of good quality sleep over numerous days, the negative effects build up, creating a sleep debt. This sleep debt can be calculated as the difference between the amount of sleep a person needs and the amount they actually get. The greater sleep debt a worker has, the more likely they are to experience the negative effects of fatigue, and it can lead to poor functioning and health. Workers who have built up sleep debt, require at least two consecutive nights of unrestricted, good quality sleep for their sleep structure to return to normal (WorkSafe, 2021, Port Health and Safety Leadership Group, 2022).

Figure 5: Recommended Sleep Duration by Age (National Sleep Foundation, 2020)



Circadian Rhythms

Circadian rhythms are biological, biochemical and behavioural and biological processes that occur in the body, on an approximately 24 hours cycle. Understanding how these work, including how they interact with disrupted sleep and shift work is important (WorkSafe, 2021).

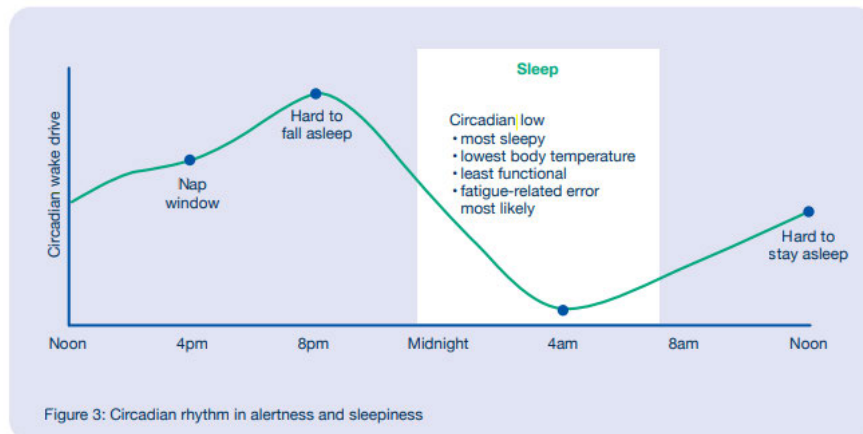
People are wired to be active and alert during daytime hours, and to sleep at night. This is due to what is known as the circadian body clock. This internal 'clock' in the brain, keeps time in step with daylight hours and the 24hour day and night cycle, mainly through exposure to daylight. The circadian body clock controls many daily processes in the body, from temperature, hormone, staying and falling asleep to mood. These processes are called circadian rhythms (WorkSafe, 2021, Port Health and Safety Leadership Group, 2022).

If the natural timing of the circadian body clock and circadian rhythms is disrupted, people can experience shorter, poor-quality sleep, sleepiness, poor functioning and poor health. The circadian body clock cannot fully adapt to the changes that shift work brings (WorkSafe, 2021).

Below is a diagram of the circadian rhythm for alertness and sleepiness. As it shows, the circadian body clock makes people feel sleepiest in the early hours of the morning. At this time,

they are most likely to be error-prone and least functional. There is a second peak of sleepiness in the late afternoon. It is also difficult to fall asleep in the morning as this is when there is an increase in alertness, making it difficult for people to sleep during the day. For workers who work nights, this means that their sleep is often cut short or of poor quality ((WorkSafe, 2021, Port Health and Safety Leadership Group, 2022).

Figure 6: Circadian rhythm in alertness and sleepiness (Port Health and Safety Leadership Group, 2022)



Workload

Workload and pace can also influence upon a worker's level of fatigue. This includes a combination of how difficult the work is, how well the worker can meet the demands and how physically or mentally intense the work is.

Workload is made up of a combination of the following (WorkSafe, 2021).

- Intensity of task (physical and mental effort).
- Duration of task (length of time it takes).
- Complexity of task (how easy or difficult it is).
- Worker's ability to meet the above demands.

Below are some of the effects that workload can have (WorkSafe, 2021, Port Health and Safety Leadership Group, 2022).

- High physical or mental workload can lead to fatigue because of the effort required to do the work.
- Tasks that require periods of intense concentration can increase fatigue.
- Work pressure or criticism can be emotionally tiring and increase fatigue.
- Workload can also delay or disturb later sleep due to rumination, anxiety etc leading to further poor-quality sleep.
- Fatigue can become more obvious when workload is low due to lack of stimulation.

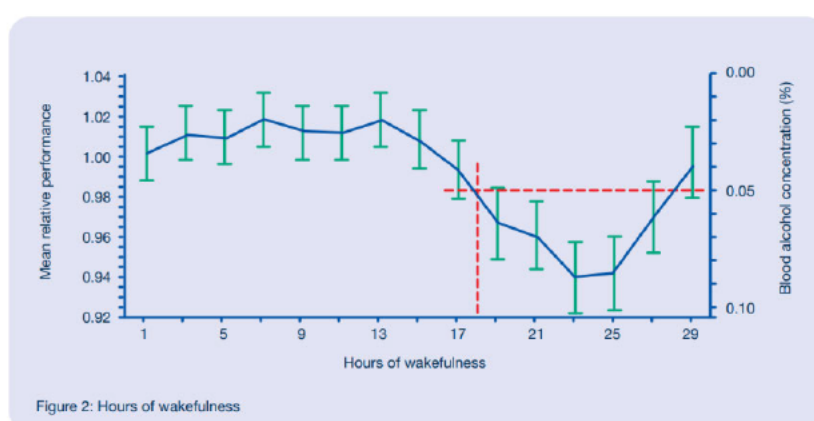
Workers can also develop what is known as time-on-task fatigue when they perform mental or physical task, which are either difficult or require high concentration, for an extended period without stopping. This type of fatigue is made worse by sleep loss and night work (WorkSafe, 2021, Port Health and Safety Leadership Group, 2022).

Length of Wakefulness

Length of time of wakefulness impacts on fatigue. Research by Dawson and Reid (1997) found that cognitive psychomotor performance decreased by 0.74% per hour between 10 and 26 hours of wakefulness. This was equivalent to a 0.004% rise in blood alcohol concentration. After 17 hours of sustained wakefulness, this decrease in performance is equivalent to a blood alcohol concentration of 0.05% and after 24 hours 0.10%.

For comparison, for those over 20, the blood alcohol driving limit is 50 milligrams of alcohol per 100 millilitres of blood (0.05) (NZ Transport Agency Waka Kotahi, 2025).

Figure 7: Hours of Wakefulness Mean Relative Cognitive Psychomotor Performance Compared to Blood Alcohol Concentration (Port Health and Safety Leadership Group, 2022).



Shift Length

Below are the recommendations from a number of pieces of guidance on shift lengths to manage fatigue. As can be seen in the above table, the limit recommended by multiple regulators and pieces of guidance is for shifts no longer than 12 hours.

Table 1: Guidance Recommendations for Shift Length

Guidance	Recommendations
WorkSafe Quick Guide, 2021	• The longer the shift, the greater the likelihood of fatigue. • Schedule shifts no longer than 8 hours when the work is monotonous, mentally or physically demanding, or isolated. • Carefully monitor overtime and unplanned shift extensions. • Make arrangements to cover absentees. • Night shifts are disruptive. They cause sleep loss, lighter sleep during the day, and mean that people are working at less functional times.
WorkSafe Good Practice Guide, 2021	• Shifts up to 8 hours in length are considered to provide more time for rest (including sleep), commuting, and domestic and daily activities that are important for health and functioning. • Schedule shifts no longer than 8 hours when the work is monotonous, mentally or physically demanding, or isolated.

Guidance	Recommendations
	• 12-hour shifts can increase the likelihood fatigue, depending on the type and duration of work being carried out. The likelihood of fatigue when working 12-hour shifts is further increased when they occur during or overlap with night-time hours. • Consecutive 12-hour shifts can result in the build-up of a sleep debt. • Vulnerable workers, such as older people or new parents, may have an increased likelihood of fatigue when working a shift of 12 hours or more. • 12-hour shifts can increase the likelihood of fatigue if workers take on overtime or second jobs in their free time. • Limit 12-hour night shifts to two to three consecutive nights. • Alertness and performance will deteriorate significantly over a shift longer than 12 hours.
Safe Work Australia, 2013	• Limiting shifts to 12 hours long, or 8 hours if they are night shifts and/or the work is demanding, monotonous, dangerous and/or safety critical. • If 12-hour shifts worked, then no overtime worked in addition. • Avoid long working hours (more than 50 hours per week). • If 8/10-hour shifts, then no more than 4/2 hours extra overtime to be worked. • Account for travelling time of workforce. • Monitor actual time worked against the allocated roster and identify if excessive hours are being worked. • Avoiding quick shift changeovers such as finishing at 11pm and starting again at 7am. • Ensuring that workers have and take adequate and regular breaks so that they can rest, eat and rehydrate. • Designing working hours and rosters to allow for good sleep opportunity and enough recovery time between workdays or shifts for travelling, eating, washing and sleeping. • Developing a working-hours policy on daily work hours, maximum average weekly hours, total hours over a three-month period, on-call work and work-related travel. • Developing procedures to manage and limit excessive working hours, for example, requiring minimum breaks on a regular basis, especially during longer shifts. • Scheduling safety critical work outside the low body clock periods between 2am and 6am and between 2pm and 4pm. • Limit shifts to 12h including overtime, or to 8h if they are night shifts and/or the work is demanding, monotonous, dangerous and or safety critical.
WorkSafe Victoria, 2020	• Eliminate or reduce the need to work extended hours or overtime • Avoid working arrangements that incentivise excessive work hours

Guidance	Recommendations
	• Minimise weekly work hours to 48 hours or less to prevent errors and promote sleep. • Limit shifts to 12 hours, including overtime. • Develop a working hours policy on daily working hours, maximum average weekly hours, total hours over a three-month period and work-related travel. • Control overtime, shift swapping and on-call duties.
Health and Safety Executive UK, 2006	• 8-hour shifts are considered to be the optimum length for sustained and consistent work. • Shifts should not be planned to be longer than 12 hours. Avoid overrun and discourage overtime. • Shifts longer than 12 hours: Alertness and performance can significantly deteriorate over long shifts, which may increase the risk of errors and accidents.
Port Health and Safety Leadership Group, 2022	• Shifts of up to 8 hours provide more time for rest, which includes time for sleep, commuting, and domestic and daily activities. Fatigue is more likely in any shift longer than 8 hours and when the total number of work hours in a week is high. • Avoid shifts longer than 8 hours when the work is monotonous, mentally or physically demanding, or isolated. • 12-hour shifts can make fatigue more likely, depending on the type of work and how long any particular task continues. • Fatigue when working 12-hour shifts is even more likely when those hours occur during, or overlap with, night-time hours. • Working consecutive 12-hour shifts can build up a sleep debt and result in a high number of work hours. • Vulnerable workers, such as older people or new parents, may have an increased likelihood of fatigue when working a shift of 12 hours or more. • Limit 12-hour night shifts to two to three consecutive nights. • The longer the shift, the more likely it is that fatigue will increase. Alertness and performance will deteriorate significantly over a shift longer than 12 hours. • Split shifts can lengthen a working day and can make fatigue more likely if the rest break between shifts is too short. Split shifts that include early starts and late finishes shorten the opportunity for night-time sleep, which makes fatigue more likely. Workers may not be able to sleep during the day in the rest break between shifts. Avoid split shifts if reasonably practicable.

Rest Breaks

New Zealand law sets minimum break requirements. This includes 10 minutes paid and 30-minute unpaid breaks, dependent upon the length of time worked (Employment New Zealand, 2025).

Under the Health and Safety at Work (General Risk and Workplace Management Regulations 2016), facilities where workers can eat and take breaks, toilets, drinking waters and hand washing facilities must be provided to workers in a workplace. (WorkSafe, 2018)

Below are the recommendations from several pieces of guidance on rest breaks and fatigue.

Table 2: Guidance Recommendations for Rest Breaks

Guidance	Recommendations
WorkSafe Quick guide, 2021	• Frequent short breaks can reduce fatigue, improve productivity and may reduce the likelihood of incidents. • Encourage workers to take frequent and regular breaks. • Give workers enough time between shifts to recover from the work.
WorkSafe Good Practice Guide, 2021	• Frequent short breaks can reduce fatigue, improve productivity and may reduce the likelihood of errors and accidents. It is better for workers to take their breaks away from their workstations.
Safe Work Australia, 2013	• Ensure that workers have and take adequate and regular breaks so that they can rest, eat and rehydrate.
WorkSafe Victoria, 2020	• Provide breaks to support recovery – for mental fatigue, breaks should be frequent and of short duration (contain information about napping in a safe and recovery orientated manner)
Port Health and Safety Leadership Group, 2022	• It is important for workers to take regular rest breaks from tasks that have a high workload as this can help prevent them from becoming impaired during a single work period. • Frequent short breaks can reduce fatigue and improve productivity and may reduce the likelihood of errors and accidents. • Workers get a better-quality rest when they take their breaks away from their workstations.
Health and Safety Executive UK, 2006	• Encourage and promote the benefit of frequent and regular breaks to reduce the risk of fatigue. • The risk of fatigue-related problems is higher towards the end of a shift and also during the night. Frequent short breaks can reduce fatigue, improve productivity and may reduce the risk of errors and accidents, especially when the work is demanding or monotonous. • A break taken away from the workstation and/or work environment is considered to be more beneficial than those taken at the workstation. • Make facilities available and encourage workers to take their longer breaks away from their workstation.

Scheduling of Rest Days

Scheduling of work is a common control measure for managing fatigue. It is important that adequate rest days are scheduled to ensure workers have enough time to rest and recover from work. Below are the recommendations from several pieces of guidance on rest days and fatigue.

Table 3: Guidance Recommendations for Scheduled Rest Days

Guidance	Recommendations
WorkSafe Good Practice Guide, 2021	• Give workers enough time in their rest breaks between shifts to recover from their shift, commute, eat well, sleep, and participate in social/domestic activities. • The likelihood of fatigue is increased when the breaks between shifts are too short. • The timing of breaks between shifts are important. This determines the likelihood of obtaining enough, good quality sleep during a break. • Rest days are opportunities for unrestricted sleep. A person usually achieves unrestricted night-time sleep when they go to bed and rise when they choose, and when the sleep period occurs at night. This is the key point to understand when it comes to considering the number of days needed for recovery between a series of consecutive shifts. • Too many consecutive work days can increase the likelihood of fatigue, ill health, errors and accidents. • Sleep loss and fatigue can build up if there are too many consecutive night shifts or early morning starts or late finishes. Fatigue occurs when a sleep debt builds. • In general, set a limit of five to seven consecutive working days for standard shifts. • When switching from day to night shifts or vice versa, allow workers a minimum of two nights of full unrestricted sleep so they can recover from the effects of the previous work schedule. • Rest days are best when they allow the worker to recover from a work schedule, and to take part in social/domestic activities. It is ideal if some weekends are included in rest days. • The number of rest days needed for recovery after a series of consecutive shifts depends mostly on the sleep debt that has built up.
WorkSafe, 2017	• Work schedules – hours of work, night work and shift work (including breaks between shifts): Long work hours, irregular work hours, and schedules that require night work can cause fatigue. These schedules limit the time for a person to physically and mentally recover from work. • Working at night interrupts the natural sleeping rhythm, which can cause fatigue. • Design rosters well to allow for good sleep opportunity and recovery time between workdays. • Make sure that rosters are designed to remove any sleep debt. (Note: sleep loss is cumulative.) • Design rosters that minimise disruptions to natural sleeping rhythms.

Guidance	Recommendations
	• Avoid work starts before 6.00 am where possible. If night work is required, limit the number of night shifts in a row that your workers can work.
Safe Work Australia, 2013	• Limit consecutive workdays to a maximum of 5-7 days. • Allow a minimum of 12 hours between shifts (Rest period between shifts should permit enough time for commuting, meals and sleep.) • Build regular free weekends into the shift schedule, advisably at least every three weeks.
WorkSafe Victoria, 2020	• Schedule an adequate number of employees and other resources to do the job to avoid placing excessive demands on staff. • Use workforce planning to appropriately schedule leave and other staff commitments such as training. • Provide adequate breaks between shifts to allow employees enough recovery time (including travel, family time, leisure and socialising, and exercise time). • Try to ensure at least 12 hours between shifts. • Allocate shift workers consecutive days off, including some weekends • Ensure you have a process for managing unplanned absences to manage workload and work pace and support recovery. • Provide appropriate recovery time for staff who have been affected by unplanned absences and inadequate staffing. • Enable staff to speak up if they are feeling fatigued and unable to work without risk and clear actions to be considered to reduce risk of fatigue-related incidents, such as adjustment of work distribution/allocation. • Provide an adequate period of non-work following a sequence of night shifts (a minimum of two nights is recommended).
Port Health and Safety Leadership Group, 2022	• Work allocation is a common planned control measure for managing fatigue risk. The best form of work allocation is permanent day work with unrestricted sleep at night. This means that any other arrangement of work will always be a compromise, and rosters will differ in their strengths and weaknesses. • When planning work allocation, consider how many rest days and opportunities for unrestricted sleep workers will require after shifts to allow them to fully recover from fatigue. • Build regular weekend breaks into the shift schedule where reasonably practicable. • When night shifts or shifts with early morning starts are longer than 7-8 hours, think about how many shifts workers should work in a row before having rest days. • The number of days required to fully recover greatly depends on the nature of the previous work pattern and most importantly, on the sleep debt that the worker has built up. Consider the sleep debt that will build up as a result of the work pattern.

Guidance	Recommendations
	• Too many consecutive workdays or a high number of weekly work hours can increase the likelihood of fatigue, ill-health, errors and accidents. • Sleep loss and fatigue can build up if a worker has too many consecutive night shifts, early morning starts or late finishes. • In general, set a limit of five to seven consecutive working days for standard shifts and consider an appropriate limit for weekly work hours. • Fatigue is more likely when the breaks between shifts are too short, such as when you split into 6 hours and 4 hours with a shift in between, the worker will not recover as well as they would with an unbroken 10 hours between shifts. • The timing of breaks between shifts is important. This determines how likely it is that a worker will get enough good-quality sleep during a break.
Health and Safety Executive, 2006	• Workers need sufficient time between shifts to commute, eat meals, sleep and participate in domestic and social activities. Under Working Time Regulations (UK only), the minimum time allowed between shifts is 11 hours. • In general, a limit of 5-7 consecutive working days should be set for standard (i.e. 7-8 hour) shifts. • For night shifts and for shifts with early morning starts it may be better to set a limit of 2-3 consecutive shifts, followed by 2-3 rest days to allow workers to recover. • Too many consecutive workdays can lead to an accumulation of fatigue and increase the risk of fatigue-related problems including ill health, errors and accidents. • Under Working Time Regulations (UK only), workers are entitled to a 24-hour day off per week, although days off may be averaged over a fortnight.

Worker Ability to Judge Level of Fatigue

Fatigue may not be obvious to workers and may affect their ability to judge their own level of impairment. Beyond the first two to three nights of not having good quality sleep, workers report not feeling any sleepier, despite their functioning worsening. Eventually, the need for sleep reaches a point where they may lose control over when they fall asleep or have micro sleeps. There are potentially fatal consequences should this happen when a worker is driving (Port Health and Safety Leadership Group, 2022).

As fatigue might not be obvious to workers, they should not be left to self-monitor their fatigue. Instead, monitoring needs to be a joint responsibility, involving managers, team members/colleagues and the individuals themselves. (Port Health and Safety Leadership Group, 2022).

Feedback from the February 2025 HSW Guardrails Workshop

A large amount of feedback was gathered during the HSW guardrails workshop on what drives longer working hours and ways these could be reduced.

Feedback on what drives longer working hours included the following.

- Budget – overnight travel, numbers of staff etc
- Legislative requirements – need to complete the preliminary count on election day, timeframe for when completed count due
- Lack of resources on the ground - numbers of staff available
- Distances to travel
- Community engagement time requirements (after business hours)
- Time constraints for when work is due/required
- Reliance on key staff members, or on salaried staff.
- Desire to see the job completed
- Last minute changes

Feedback on how to reduce working hours included the following.

- Having more people share the load, hiring extra workers
- Having everyone log their hours worked, monitoring of hours and early intervention
- More resources in the regions, contingency to budget for more staff as needed
- Monitoring workloads
- Automation of tasks
- Establishing an early plan for support where needed
- Setting more realistic expectations about timeframes for delivery
- Planning – logistics, issues and how to avoid them
- Simple training and recruitment processes
- Health and safety decision making guidelines

Te Kauhanganui Critical Controls Kete of Controls Workplan

Strategic Priority: Strengthening our Foundations

Activity	Deliverables	Information Required	Trial during By- Election	Allocated VS team support	Due Date	Completed	Notes/Updates
Assessment of roles which are 'required' to work beyond 12 hours	Determination of exactly which roles are required to work beyond 12 hours on Election Day and where/what days are 'crunch points'	- Which roles absolutely 'must' work beyond 12 hours on election day e.g. VPM and EM - Which roles can stay under 12 hours on election day	No	GE2026 - Anne s9(2)(a)	TBD		To enable mapping out where the risk is present and highest across the workforce.
Assessment of days/times where there are crunch points	Determination of where/what days/times are 'crunch points' where employees may go over 12-hour limit outside of election day.	- What regions/areas can we not recruit enough people to keep employees under 12 hours - What days/weeks outside of election day would we potentially go over the 12 hours.	No	GE2026 - Anne s9(2)(a)	TBD		To enable mapping out where the risk is present and highest across the workforce. To enable mapping out what days/weeks we may need to do some planning around fatigue – where the 'hot spots' are with workload e.g. nominations day?
Driving roles do not work over 12 hours/Past 12pm (if having worked a full shift)	Map out which roles will be working over this time and driving for work e.g. mobile support and explore options for ensuring they do not work over 12 hours or past 12pm.	Which roles primarily drive/do a large amount of driving on election day e.g. mobile support.	Yes	By-Election – Maree s9(2)(a) GE2026 - Anne s9(2)(a)	TBD		To enable mapping out where the risk is present and highest across the workforce.
By Election Trial	Trial kete of control options during by election.	What kete of control options can we trial during the by election	Yes	By-Election – Maree s9(2)(a) GE2026 - Anne s9(2)(a)	TBD		Potential Options: - How we monitor hours for permanent and fixed term (non-time sheet staff). - Roving mobile support.
Revisit Mobile Support role	Investigate option of using mobile support role to help with breaks or other issues further.	- What regions/areas would this work best for e.g. rural vs urban - How would this role work e.g. would it 'float' or specifically go a help with breaks etc - Costings	No	GE2026 - Anne s9(2)(a)	TBD		

Te Kauhanganui Critical Controls Kete of Controls Workplan

Strategic Priority: Strengthening our Foundations

Activity	Deliverables	Information Required	Trial during By- Election	Allocated VS team support	Due Date	Completed	Notes/Updates
Voting Place Manager's (VPMs) setting up Voting Place (VP) the night before election day	Investigate option of setting up VPs the night before the election.	- Determination of what/which voting places this is a possibility for. - Determination of how much time would be allocated for set-up. - Costings	Yes	By-Election – Maree s9(2)(a) GE2026 - Anne s9(2)(a)	TBD		
VPMs who work election day do not work the day before/advanced voting period	Investigation further VPMs not working the day before or advanced voting period.	- Would it be day/week before/the whole advanced voting period? - How to build into training etc for rostering/recruitment managers/EMs. - Are there areas/regions this wouldn't be possible? What constraints are there to this approach with staffing availability. - Exemption process – what if we have a voting manager call in sick, can we call on someone who worked the day before and what we do if we do e.g. fatigue assessment. - How to we lead/promote this to ensure that it occurs - Exclude set up day before	Yes	By-Election – Maree s9(2)(a) GE2026 - Anne s9(2)(a)	TBD		By-Election: Trial Thurs or Fri off

Te Kauhanganui Critical Controls Kete of Controls Workplan

Strategic Priority: Strengthening our Foundations

Activity	Deliverables	Information Required	Trial during By- Election	Allocated VS team support	Due Date	Completed	Notes/Updates
Deputy Electorate managers	Investigate further Deputy Electorate Managers (EM) to allow for day off week before election and to allow EMs to start later the day before the election	- What would a deputy EM be responsible for? - How is the duty delegated? Is there a formal requirement etc - What days/hours would the DM do? - Would this fit into/on top of another role, or be a separate role?	No	GE2026 - Anne s9(2)(a)	TBD		
VPMs/EMs do not work the day after the election (and what other roles)	Investigate further the ability for VPMs/EMs to not work the day after the election.	- What work is required on this day and who/what role is required to do it? - Can another role do this work e.g. start on that day. - What other roles should have this day off - How do we train and lead this to ensure that it occurs.	Yes	By-Election – Maree s9(2)(a) GE2026 - Anne s9(2)(a)	TBD		By-Election: Trial for VPMs. For Headquarters staff, shorter day and starting later.
Large or busy voting places have two VPMs	Investigate large or busy voting places having two VPMs	- What voting places traditionally are large and/or have large numbers or voters or quite a few electorates they collect votes for? (Mapping out where this control should be used) - How would the overlap work? What time would they start? What kind of handover would they give? - Costings	No	GE2026 - Anne s9(2)(a)	TBD		Note: could also look at possibility for returning material officer in line with AEC role.

Te Kauhanganui Critical Controls Kete of Controls Workplan

Strategic Priority: Strengthening our Foundations

Activity	Deliverables	Information Required	Trial during By- Election	Allocated VS team support	Due Date	Completed	Notes/Updates
Cut off time for preliminary count.	Investigate options for a time at which the preliminary count is cut off for VPMs who are struggling or taking a long time.	- How would this work? What time? What struggles? What considerations e.g. time/driving time. - Considerations around 'chain of custody'/security of materials etc if they are not counted or reconciled. - Potential media pressure or enquires if the prelim count is not completed. Are there certain areas or electorates that may face more pressure etc.	No	GE2026 - Anne s9(2)(a)	TBD		Not just about cut off point. If people are struggling, having plans in place for how we will support them.
Driving distances longer than an hour	Explore options for ensuring that workers do not need to drive distances longer than one hour to drop off or deliver material at the end of their shift.	- Which voting places/areas have the longest drive time to the headquarters (can only be done after the headquarters are procured) - Where can we put in storage places/drop off hubs to shorten the drive distance. - Costings.	Yes	By-Election – Maree s9(2)(a) GE2026 - Anne s9(2)(a)	TBD		By-Election: Supported by logistics and mobile support. Hubs currently being sourced.
Regular breaks	How we ensure employees are getting their regular breaks.	- How do we champion/lead this to ensure that it occurs? - How do we support VPMs who struggle with this? - Training etc for VPMs	Yes	By-Election – Maree s9(2)(a) GE2026 - Anne s9(2)(a)	TBD		

Te Kauhanganui Critical Controls Kete of Controls Workplan

Strategic Priority: Strengthening our Foundations

Activity	Deliverables	Information Required	Trial during By- Election	Allocated VS team support	Due Date	Completed	Notes/Updates
Ops/ES manuals	Ensure Ops and ES manuals are updated with Te Kauhanganui Critical Controls information	- Approved Te Kauhanganui - Some controls information above approved/completed. - What date is this all needed by.	No	GE2026 - Anne s9(2)(a)	TBD		
Process for ensuring incorporated into regional/electorate planning.	Ensure that the kete of controls is incorporated into the electorate planning process.	- How does this get incorporated into the planning? E.g. separate section, or into each section of plan. - How to we assure it has been done/quality – who checks?	No	GE2026 - Anne s9(2)(a)	TBD		By-Election: To look at logistics plan once completed and see how safety factors in.
FRM Identification and Management Guidance	Development of fatigue risk management guidance identifying, managing. Both for people and their leaders.		Yes	By-Election – Maree s9(2)(a) GE2026 - Anne s9(2)(a)	TBD		By-Election: Trial fatigue assessment as needed.
FRM Exemption guidance and escalation processes for hours over 50	Develop guidance for exemptions to Te Kauhanganui Critical Controls and escalation processes when hours exceed 50.		No	GE2026 - Anne s9(2)(a)	TBD		
Accountability, monitoring and reporting processes	Develop accountability, monitoring and reporting processes	- What ways of monitoring would best and easiest capture the hours staff are working? - How do we report on this? - Who is the accountable people in the chain when issues are raised?	No	GE2026 - Anne s9(2)(a)	TBD		

Item # 25.09-08

Item: Risk and controls update

To: Electoral Commission

For: Board meeting 16 September 2025

Prepared by: Leigh Deuchars, DCE Strategy, Governance and Development

Recommendations

It is recommended that the Board:

1. **discuss** and **provide feedback** on the draft management update on the PwC report (Appendix A).

Purpose

1. This paper provides:
 - an update to the Board on risk and assurance activities and progress throughout August and early September
 - a draft management update on the PwC report for discussion and feedback.

Background

2. The Office of the Auditor-General's (OAG) report following the 2023 General Election (GE2023), and the subsequent PwC review, identified a number of systemic issues facing the election that required a strategic, long-term response.
3. As well as a significant work programme to develop and embed risk management practices, the recommendations from the OAG and PwC reviews have been embedded in the General Election 2026 (GE26) programme workstreams. Each workstream has deliverables that have been mapped to the recommendations they will address.

Discussion

The Tāmaki Makaurau by-election has impacted on planned activity but has also provided an opportunity to test new controls and practices

4. The by-election has redirected resources from existing development work; however, teams have taken the opportunity to re-test controls trialled in the July Headquarters (HQ) test and to trial three new manual controls.
5. Two risk and assurance (R&A) team members were in the by-election HQ to:
 - observe the testing of the new controls
 - understand the current processes

- observe the official count with a particular focus on the dual votes process.
6. As the workstreams test and finalise controls and design solutions to remaining gaps, the context gained will help the R&A team in their assurance role.
 7. While the workstreams are not yet at the point of producing monitoring and oversight dashboards, key milestones, thresholds and assurance steps were implemented in the governance and oversight of the by-election.

Work is underway to prepare for the OAG update and the release of the PwC report

8. As part of the broader stakeholder plan, we have informed the OAG of the upcoming update on progress and the release of the PwC report. We have explained the context for the workplan and the requirement for confirmation of funding before the full workplan can be finalised.
9. Due to the dependency on funding, we were unable to provide a complete management response to the PwC report at the time of finalisation. Therefore, to ensure completeness, we have produced a management update specifically addressing the PwC recommendations to accompany the report. It is not intended to replace the communications material produced for the release. A first draft is attached for your visibility and feedback (**Appendix A**). Please note that further quality assurance and testing of this document will occur prior to the Board meeting.

Progress made against the recommendations

10. **Appendix A** includes a summary update on each PwC recommendation and key next steps. This update has been provided by the action owners and has yet to be validated by the R&A team.
11. Key specific updates and progress to note.
 - New manual and automated controls for vote counting and data entry were tested during the HQ test on 17 July. Key controls introduced and tested include:
 - two staff confirming the accuracy of information being entered into the Election Management System (EMS)
 - system flagging and not allowing progress where information entered does not reconcile.
 - The manual controls were further tested during the by-election. Following the by-election, these controls will be reviewed and subsequently embedded into operational processes.
 - Increased risk and assurance resource has now been recruited which will enable more accurate monitoring of the progress of recommendations.
 - The risks for key teams have been identified and populated in the Enterprise Risk Register. The next stage is to support teams to identify their mitigations for high risks so that we have a better understanding of our controlled risk landscape.

- Extra functionality will be added to the Electoral Roll Scrutiny Application (ERSA) to raise the visibility and auditability of dual votes and post-Writ change information that is managed in the system. This development will not commence until September at the earliest, so will not be able to be tested in an Operational Simulation in October.

Next steps

12. The August report noted that, overall, there is some positive progress towards addressing the recommendations and risks identified through the programme. It noted that some areas of the programme were at risk due to the impact of the by-election. This should be balanced against the benefits of the by-election to test systems and processes, raise unanticipated issues and enable adjustments to be made ahead of GE26.
13. There are plans in place to assess feasibility and baseline the GE workstream deliverables that are mapped to the recommendations. Flow-on impacts to the delivery of OAG / PwC recommendations and any resulting change in risk profile will be reported to the Board.

Appendices

A: DRAFT Management update – PwC report.

Item # 04

Item: Post-election Workforce Considerations

To: Programme Board

For: Meeting of 9 October 2025

Prepared by: Adele **s9(2)(a)** Principal Advisor Voting Services

Purpose

1. To provide recommendations for improving the staff capacity and capability for the post-election period of the 2026 General Election (GE2026), including for the implementation of the new manual count controls that were tested during the Tāmaki Makaurau By-election.

Recommendations

It is recommended that you:

2. **Note** a key objective of the Post-election Workstream is to de-risk the post-election period so that complete, valid and accurate official results can be delivered on time.
3. **Note** the Office of the Auditor-General's recommendations regarding the capability and capacity of staff to undertake post-election activities, which recognised the importance of the timing of recruitment, the skills recruited for and staff fatigue.
4. **Note** that the Post-election Detailed Design document outlined that a minimum of \$644,000 would be needed to de-risk post-election processing and that this funding was included in the improvements budget allocated to the Post-election Workstream as follows:
 - \$375,000 for HQ roles, noting that funding in addition to this would be required to increase the training.
 - \$269,000 to fund a 'dual votes flying squad'.
5. **Note** that work has been undertaken to validate the staffing rationale driving this funding, with a view to addressing key issues that arose in GE2023 and managing results-related risks.
6. **Agree** that \$569,641 is allocated to increasing the number of hours post-election roles are funded across the electorate HQs to improve the capability of those roles by ensuring they:
 - Undertake a strengthened programme of training
 - Are available to participate in the Post-election Dress Rehearsal
 - Have sufficient time to prepare for the processes they are responsible for, including final check-ins on their readiness to proceed.
7. **Agree** to an approach of providing targeted support to the field based on the principle of materiality, which will focus the support on those electorates that have close results – noting that further work is required to finalise the tolerances that will determine materiality and how the support will be provided.
8. **Note** that new manual controls were successfully trialled during the Tāmaki Makaurau By-election relating to the count of votes, capture and entry of results data.

9. **Agree** that the new manual controls be incorporated into the suite of controls that support the delivery of accurate results, which will have the following impact on budget and scope as follows:
- \$87,933 for additional HQ Support hours to be included in HQ budgets (noting that this brings the total amount of additional funding requested for the Post-election Workstream to \$657,574, \$13,574 higher than the amount allocated from the improvements budget).
 - Additional funding of up to \$122,796 for the splitters and headsets that enable this to be implemented, which will need to be managed through the General Election Temporary IT Infrastructure (GETII) project. A separate change request will be presented to the Programme Board regarding this change.

Background

10. The Commission is currently undertaking work to mitigate the critical risk that it might not be able to provide a complete, accurate and timely official result for the 2026 General Election (GE2026).
11. There are many inherent and potential causes that might result in this negative outcome. The Officer of the Auditor-General (OAG) Review 2023 highlighted the key areas that they recommended the Commission review; covering quality assurance checks and controls, processes, IT systems and hardware, risk identification processes, and personnel requirements.
12. The OAG has recommended that the Commission 'review the personnel requirements for elections, the process for recruiting and training election workers and planning for contingencies (such as staff unavailability, system outages and fatigue)'.
13. Specifically for the post-election period, the OAG suggested that the Commission:
- Consider the timing of recruitment for post-election managers (PEMs) and process leaders (PLs), alongside ensuring that Electorate Managers (EMs) have appropriate guidance about the skills required for these roles as they differ from pre-election and election day work (Para 4.102)
 - Take staff fatigue into account during the post-election period as a significant operational risk that the Electoral Commission needs to manage carefully. This includes ensuring staff responsible for final count and quality assurance checks are adequately rested through appropriate rostering and/or additional resourcing (Para 4.105)
 - Review it's resourcing so that post-election work can be completed in a timely way (Para 4.107).
14. Discussions were held in late 2024 on how post-election resourcing could be improved to ensure post-election delivery timeframes are met and results are accurate. A minimum of \$644,000 was included in the Post-election Detailed Design Document (DDD)¹ for this and included in the improvements budget associated with the Post-election Workstream. The funding was tagged to the following initiatives:
- A minimum of \$375,000 for electorate headquarters (HQ) roles, noting that additional funding would be required to increase the training
 - \$269,000 to fund a 'dual votes flying squad'.

¹ Considered by the Programme Board on 6 March 2025. [08. Post Election - Detailed Design Document v1.0 FINAL.pdf](#)

Discussion

15. A number of factors contributed to GE2023 post-election activities, such as results assurance and the finalisation of dual votes, not being fully completed prior to the release of the GE2023 official results.
16. One of the factors related to resourcing issues. Issues identified were:
- Roles being unclear about their accountabilities, particularly in relation to results assurance, and not receiving appropriate training
 - Staff fatigue accumulating during the critical voting delivery period, where there were insufficient roles recruited and trained to provide effective cover
 - Staff being diverted from their substantive roles as they were unwell, needed to fill vacancies in other critical field roles, or diverted into managing issues rather than focus on their substantive roles
 - Electorates not receiving adequate support or oversight, particularly where they had close preliminary results and/or were at risk of non-completion.
17. Taking both these identified issues and the OAG's recommendations into account, the following discussion points are focused on post-election resourcing from two main perspectives:
- Understanding what resourcing is required to ensure the field can achieve its key objectives in the post-election period
 - Understanding what additional support can be provided to help reduce the risks of not completing all of the processes needed to release the official results.
18. The following discussion also includes the assessment of the effectiveness of the additional manual controls trialled at the Tāmaki Makaurau By-election, and the related resourcing implications of their implementation for GE2026

Post-election resourcing in the Voting Services field

Post-election Managers and Process Leaders

19. The Electorate Manager (EM) is responsible for recruiting four roles specifically to manage post-election activities in electorate HQs. These are:
- One Post-election Manager (PEM) – set-up to lead and oversee post-election processes, with responsibilities for planning personnel and space, completing preparations, managing the process leaders and monitoring progress.
 - Three Process Leader (PL) roles – one for each of the key post-election processes: the official count of votes; special vote processing; and dual votes investigations.
20. These are all casual roles, requiring relatively skilled people for a short period of time. Appendix 2 outlines the skills and competencies listed in the current position descriptions. It is noted that the skills and competencies do not differ substantially, so work is required to ensure these are appropriately articulated for each role. This will be completed in conjunction with the Temporary Election Delivery Workforce Workstream.

Previous staffing approach for PEMs and PLs

21. Both the PEM and PL roles were newly established in GE2020. Post-election activities had previously been overseen by the key HQ manager roles². However, after GE2017 it was

² The equivalent Logistics & Supplies (LSM) and Recruitment & Rostering (RRM) manager roles respectively oversaw special votes processing and the official count, with the Electorate Manager (EM) often investigating dual votes.

recognised that they no longer had the capacity to adequately train and prepare for post-election due to the increasing demands of preparing for and delivering a growing advance voting service.

22. In the past two elections both roles have only been funded part-time, starting four weeks out from the post-election period. They were funded to complete their training, with only the PEM receiving further part-time funding to participate in the dress rehearsal and complete planning and preparation tasks. After Election Day, both roles were full-time, with the PEM funded for the full post-election period and PL roles for the time needed to complete their specific processes.
23. For GE2023, both the training and dress rehearsal were scheduled in the two weeks prior to the start of the voting period so that it would not conflict with the busy voting period. All of their training was in-person, ranging from just over 10 hours for the PEM and between 2.25 and 3.25 hours for the PL roles.

Proposed staffing approach

24. It is proposed to increase the hours of training for these roles, and implement an improved training package, in keeping with the training pathways being developed for other GE2026 roles across Voting Services.
25. Appendix 3 provides greater detail on hours allocated to these roles previously, and new timing expectations based on increased training, preparation and readiness timeframes.
26. We are recommending that the training hours increase in line with the improved training package that includes:
 - New eLearning to be completed prior to in-person training, providing an overview of the post-election period, the purpose of each process and high-level process steps
 - Updated face-to-face training that provides increased hands-on activities, extending the number of scenarios covered; and
 - As appropriate, new eLearning packages and/or webinars to be completed immediately prior to the post-election period to cover key points. For example, for dual votes this will include an eLearning of test case studies and a follow-up Q&A session.
27. All of the roles will be expected to participate in the post-election dress rehearsal. Planning is also underway to extend the scope of this event. For GE2023 the dress rehearsal focused on:
 - Scanning electoral rolls into the Electronic Roll Scrutiny Application (ERSA)
 - Entering the official count results in the Elections Management System (EMS)
 - Completing the special vote initial load in EMS; and
 - Undertaking the special votes qualification process in ERSA (including scanning).
28. For GE2026 this will also incorporate dual votes investigations and results quality checking processes. A clearer methodology will also be put in place for analysing the data output from the dress rehearsal and following up on any issues identified where remediation (e.g. extra training) may be required.
29. In addition to the above, the funding for the PEM's role includes extended responsibilities for overseeing the preliminary results on Election Night and Sunday E+1 activities. This has the dual purpose of:
 - Improving continuity between an electorate's preliminary and official results, particularly to ensure that issues identified on Election Night which cannot be resolved immediately are carried through to post-election for resolution
 - Using this role as a tool for implementing the Te Kauhanganui critical controls (guardrails), so that those who have been directly responsible for actively managing and supporting critical voting period deliverables can have a break after election day.

Funding requirement

30. All of the above requires funding of \$569,641 spread across the 64 electorates. Table A in Appendix 3 outlines how it provides for each electorate to have the equivalent of 28 days of additional staffing per electorate.
31. It is noted that this funding, though increased, does not assume that the roles are full-time from the start of their training, four weeks out from Election Day. This is due to the varying training and preparation needs of each role – as well as potentially the person who may fill it.
32. The approach is to give the EMs flexibility in how they recruit into these roles. In both GE2020 and GE2023 EMs filled the majority of PEM and PL roles with already employed staff (particularly trainers, mobile support, voting place managers and HQ support). Such an approach was likely taken as:
- Experience, or having elections understanding, was seen as desirable for helping HQs to successfully complete their post-election processes; and/or
 - Electorates had a limited number of applicants with the appropriate skill level, given the short-term, casual nature of the roles; and/or
 - EMs wanted to retain already employed and/or experienced staff by being able to provide full-time, longer-term employment - which could also reduce their person risk as they were a 'known quantity'.
33. Feedback from one EM who was able to recruit a highly skilled person into the PEM role, who did not have elections experience, was that the recruitment was successful as they:
- Ended up employing the person full-time to make the role was more attractive to them
 - Used the additional hours the person did not need to ready for post-election to undertake work that helped fill their knowledge gaps and increased their overall understanding (e.g. supporting the delivery of voting services, completing reconciliation-focused tasks).
34. In summary, the funding will likely be applied flexibly across the HQ workforce so that:
- If an appointment is made from within the HQ's current workforce, then it can be directed into backfilling another role (or roles) to cover the time a PEM or PL needs to complete post-election preparations; or
 - If a person who has no previous experience is recruited into the role, then that person can increase their elections understanding by participating in other activities.
35. Such discretion is only achievable where roles and responsibilities are clearly spelled out, along with the improvements made to processes and instructions, training, systems and monitoring. Also, a check on EMs being given discretion on how they recruit for this role is that the following requirements must be met:
- The staff members cannot work in the two days prior to the start of their post-election work, to ensure their work fits within critical control requirements
 - They must hand over their responsibilities from the other role or roles they hold, prior to the start of their post-election work
 - The PEM must start their role late on Election Day, so they are fresh for Election Night results processing
 - They must have completed their training and participated in the dress rehearsal.

Electorate and Regional Managers

36. The OAG has specifically noted that EMs need to have appropriate guidance on skills and competencies that need to be recruited for in the key post-election roles. Such information will be included into a new training package targeted to the EMs.

Commented [KT1]: 71

37. This training package will also cover their specific responsibilities and accountabilities for signing off their electorate's results. This will go through the quality assurance activities they must undertake, taking them through new functionality in EMS to improve error identification and raise the visibility of error resolution (this was the subject of the HQ Test completed on 17 July, with final remediations and enhancements to be completed).
38. The Regional Managers (RMs) will have a specific role in retaining an overview of the progress of the recruitment into the post-election roles and their training. RMs will be asked to report on how their electorates are filling the key roles and provide assurance that they have completed the expected training and preparations, have participated in the dress rehearsal and met all of the requirements outlined in section 35.

Other interventions

39. Interventions to help prevent the issues that occurred at GE2023 occurring at GE2026 are being built and implemented across the GE2026 programme workstreams (see Appendix 1 for a summary of these).
40. Other work is underway in the Post-election Workstream to improve systems functionality and auditability, simplify processes, clarify roles and responsibilities and ensure instructions and training are clear and complete.
41. Other workstreams are also undertaking work that will contribute to addressing potential risks in resourcing by:
- Improving recruitment processes, streamlining them for both applicants and staff
 - Looking into how to build contingency into the workforce, which is crucial to ensuring that critical post-election activities can continue regardless of attrition, fatigue, illness, or staff being redeployed to deal with other unexpected issues.

Monitoring and support

42. Further work is required to understand the monitoring and support that needs to be in place to ensure the Commission can manage its risks relating to:
- Releasing an official result that is not accurate or complete
 - Not meeting legislative requirements around the timeliness of releasing the results or completing the activities that ensure invalid votes are removed (such as the investigation and removal of dual votes).

Dual votes processing

43. Significant issues were experienced at GE2023 relating to the completion of dual votes processing.
44. The concept of the 'dual votes flying squad' was developed during Strategy-led discussions in late 2024, as a mechanism for managing critical risks relating to the non-completion of this activity. Funding of ~\$269,000 was allocated to this initiative, based on the assumption that it would be approximately 20 people providing targeted support over a 10-day period.
45. Since the dual votes flying squad concept was developed:
- The above work has been undertaken to understand how the Voting Services field's capacity can best be increased and capability enhanced, so that post-election activities are completed on time and accurately.
 - Work has also been undertaken to define and clarify current and new responsibilities, including giving the Regional Advisors (RAs) a quality checking role, which will include spot

checks on the discretionary decisions made by EMs (dual votes, vote informality and disallowed special declaration votes)

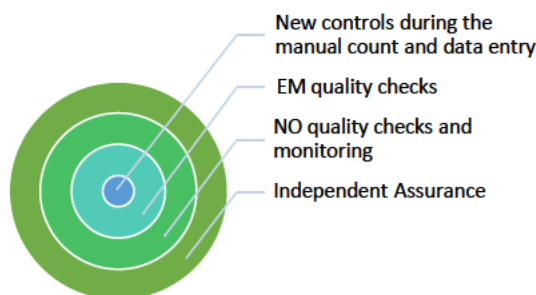
- Improved quality checking and assurance-related functionality has been built into EMS (focused on results) and agreed to be built into ERSA (focused on making the dual votes and post-Writ changes processes more visible and auditable)
- Work is underway to improve instructions and training, and develop dashboards that will improve the visibility of post-election processing progress
- Potential changes to the deadline for enrolling to vote at an election have been signalled through the Electoral Amendment Bill 2025.

46. These changes should make a material difference that means the Commission can be more certain that the risk of non-completion can be effectively managed. This also means that the Commission can move away from recruiting a relatively large group of people that would need to be trained to a high level of skill to help complete dual votes processing, to instead take a more targeted approach to assuring the quality of the processing.
47. This more targeted approach could still involve providing some electorates with extra assistance to complete their dual votes process. This additional assistance could be provided by a small number of senior Commission staff where needed. These staff members are permanent employees and so the additional funding provisionally allocated for this purpose would not be needed.
48. When deciding where targeted support should be provided, the role of materiality comes into play. PwC's internal audit report noted the Commission should focus its effort to where there is the most value – for example, managing risks where small winning margins could have a material impact on the overall results.
49. Further analysis is required to understand how the Commission will determine its tolerances and risk appetite in relation to materiality, noting that this work will take the following into account:
- A close result may apply to single electorates as well as the overall count of party votes, which could require a more significant assurance effort
 - The margin of the three electorates that were subject to judicial recounts at GE2023 ranged between 54 and 495 votes on Election Night (noting that a further three electorates had margins of between 30 and 487 votes)
 - Recounts are not always driven by margin. Recounts undertaken in both GE2014 and GE2020 related to electorates that had higher margins, but recounts were requested due to concerns about other aspects of electoral management (notably around enrolment status).
50. Based on the above, it is recommended that the Programme Board agree to the Commission taking the approach that it will target additional resources on the principle of materiality, focusing on those electorates that have close results.

New manual controls – people and technology implications

51. New manual controls, initially tested during the HQ Test held on 17 July, were further trialled during the Tāmaki Makaurau By-election. They were focused on reducing the likelihood of errors and enhancing data accuracy, to improve overall confidence in the results. The specific controls were:
- Separating parts of the manual count process so that one person sorts the votes into piles, while another checks and counts them

- Having two people involved in the process of capturing the results data at the count table
 - Having two people involved in capturing the results data phoned into HQ from voting places
 - Having two people involved in entering and checking the results data entered into EMS.
52. Feedback on the controls from both the field and National Office staff has been positive. Key comments are that the controls:
- Both picked-up and prevented errors during both the manual count and data entry processes
 - Were easy to implement, although it was noted that it was important to keep reinforcing their use during some of the processes
 - Effectively prevented errors being entered into EMS, as no transposition errors were identified through the results checking process (both Election Night and the official count).
53. In the survey completed by the Tāmaki Makaurau By-election HQ staff, either all respondents strongly agreed or agreed that the manual results controls gave them confidence that the recorded results were correct and that the information entered was accurate.
54. Suggestions were also made to streamline some of the processes undertaken, these will be taken into account as detailed process steps are finalised.
55. It was also noted that the splitters and headsets were easy to use, enabling two people to effectively listen in to the same conversation.
56. If agreed, it is assessed that the controls will further augment the suite of controls, monitoring and assurance that will work together to de-risk post-election, noting that these manual controls sit at the core – based on the principle of getting the results right at the earliest possible point:



57. The controls will require funding to be implemented. Additional HQ Support hours will be needed on Election Night to provide for a second person to staff the phones and undertake results data entry. This comes to \$87,933 across the 64 electorates, based on this role being paid \$31.27 per hour (rate taken from the people model).
58. This funding takes the total 'improvements' funding allocated to the Post-election Workstream to \$657,574 – which is \$13,574 more than has been allocated (noting that this amount was considered a minimum to be validated). If agreed, this funding would be incorporated into the electorate budgets for FY27.
59. Funding would also be required for splitters and headsets to enable two staff to listen into the calls from voting place managers. This is currently assessed to cost \$122,796, but is not currently included in the budget and scope assumptions of the GETII project. This requirement would need to be incorporated into the GETII project plan, which requires a change request to be completed and approved by the Programme Board. This funding requirement would be validated during this process.

Next steps

60. If the recommendations are agreed, the Post-election Workstream will:

- Work with the Finance Team to build the additional resourcing into the electorate budgets
- Undertake work to progress the Commission's understanding of tolerances and risk appetite in relation to post-election activities
- Determine how the Commission can best support the field, especially for electorates with close results' and effectively monitor field progress on completing post-election activities.
- Complete a change request for splitters and headsets to enable two staff to listen into the calls from voting place managers.

61. The workstream will also continue to work with other programme workstreams to:

- Ensure position descriptions are fit-for-purpose and clearly articulate key responsibilities and accountabilities.
- Plan and build improved training and readiness (dress rehearsal) packages
- Update instructions, particularly ensuring key controls and assurance activities are highlighted.

In scope post-e workstream	In another workstream	Under consideration	Critical interventions
-------------------------------	--------------------------	------------------------	---------------------------



Appendix 2: Post-election Manager and Process Leader Key Competencies

Key focus of Post-election Manager role

- Operational delivery
- Planning
- Leadership and Employee performance
- Commitment to cultural competency
- Team effectiveness and culture
- Relationship management
- Quality systems and service
- Leadership
- Health, Safety and Wellbeing

Key focus of Process Leader role

- Operational delivery and support
- Commitment to cultural competency
- Leadership
- Relationship management
- Quality systems and service
- Health, Safety and Wellbeing

Key competencies (both PEM and PL)

- Action Oriented: Is driven to accomplish tasks and takes pride in their work. Can deal with shifting rapidly from task to task.
- Attention to Detail: Is committed to following instructions and performing tasks with a high degree of accuracy.
- Integrity and Trust: Maintains public trust in the electoral process by demonstrating ethical conduct and behaviour. Follows prescribed processes to ensure accurate results.
- Interpersonal skills: Performs well in a team environment. Builds positive and effective relationships which contribute to the Commission's values and goals.

Qualifications and technical skills (both PEM and PL)

- Excellent communication, literacy, and numeracy skills.
- Good level of computer literacy with the Microsoft suite and ability to quickly learn election-based IT systems.
- Excellent data entry skills.

Experience and knowledge profile (both PEM and PL)

- Experience of providing high-level administrative support.
- Excellent interpersonal skills.
- Excellent planning and organisational skills.
- Awareness of and sensitivity to different cultural or physical needs of others.
- Ability to work accurately under pressure, displaying flexibility to change tack when needed.
- Previous election experience would be an advantage.
- Full NZ driver's license is an advantage

Appendix 3: Allocation of additional hours to roles

Commented [KT2]: across 71 electorates

Table A: Total additional hours for GE26 and cost

Role	Budgeted GE23 days and hours per role	Proposed GE26 days and hours per role	Total new hours for GE26 (variance from GE23)	Cost over 64 electorates (approx.)
Post-election Manager (PEM)	22 days	36 days (Full-time)	14 days	\$297,042
Official Count Processing Leader (OCPL)	10 days	14 days	4 days	\$77,885
Special Vote Process Leader (SVPL)	16 days	21 days	5 days	\$97,357
Dual Votes Processing Leader (DVPL)	13 days	18 days	5 days	\$97,357
Total	61 days	89 days	28 days	\$569,641

Table B: Allocation of days to critical tasks

Role	GE23 Training Time*	GE26 Training Time*	GE23 DR and Preparation time	GE26 DR and Preparation time	GE23 work during PE	GE26 work in PE	GE26 Total days
Post-election Manager (PEM)	10 hours, 10 mins	5 days	5 days	14 days	15 days	17 days**	36 days
Official Count Process Leader (OCPL)	2 hours, 25 mins	2 days	0 days	4 days	9 days	8 days	14 days
Special Vote Processing Leader (SVPL)	3 hours, 15 mins	2 days	0 days	4 days	15 days	15 days	21 days
Dual Votes Processing Leader (DVPL)	2 hours, 15 mins	2 days	0 days	4 days	12 days	12 days	18 days

* Training time includes both eLearning and face-to-face training, and travel time to face-to-face training for those electorates needing to travel to participate in the regionalised delivery.

** Includes Election Day and Sunday E+1 – noting they will need to rest the day prior to Election Day

Item: Te Kauhanganui Critical Controls Kete of Controls Recommendations

To: Programme Board

For: Programme Board meeting, 6 November 2025

Prepared by: Elaine s9(2)(a), Health, Safety, Wellbeing and Security Lead and
Lisa s9(2)(a), Workforce Planning Lead,

Recommendations

It is recommended that the Programme Board:

1. **Note** previously titled Guardrails for GE23 have changed to Te Kauhanganui Critical Controls (TKCC).
2. **Note** the risks around 12 hours being worked, that whilst within TKCC requirements, for fixed term kaimahi they exceed contractual obligations.
3. **Approve** integrity funding for critical controls to be used for a number of roles related to fatigue risk management rather than 64 Deputy Electorate Managers (EM)
4. **Approve** a funding pool of \$214,000 for other kete of controls options to be used in the regions/electorates.
5. **Note** that Regional Managers will be the keepers of the 'kete of controls'
6. **Note** the recommendation that Voting Services continues to consider fatigue risk management and TKCC as part of the determination of placement of voting places.

Out of scope

11. **Approve** 15-minute rest breaks to encourage rostering of breaks as opposed to the only 10-minutes required by law

Background

12. Long working hours and fatigue were factors raised in numerous reports post the 2023 General Election (GE23).

13. The Report of the Electoral Commission on the 2023 General Election (2024) states:

‘Long hours were sometimes worked during the election. The guardrails did not prevent people from working long hours during voting and counting periods, particularly on election day and night. Enrolment staff worked hours far more than those forecast to meet demand.’ Pg.27.

14. The Controller and Auditor General Report: General Election 2023: Independent Review of Counting Errors states:

‘Staff fatigue, particularly in the post-election period, is a significant operational risk that the Electoral Commission needs to manage carefully.’ Pg. 49.

and

‘From election day, enrolment teams were working 12 to 14 hours seven days a week to process enrolments and do enrolment checks. One Electorate Manager reported that they had been working for 17 hours by the time they had to carry out their quality assurance checks, and that other people had been working 70-hour weeks for three months. Tired people are more likely to make mistakes.’ Pg. 49.

15. A draft review of the GE23 Health and Safety Guardrails was developed early in 2025. The draft review and recommendations were shared with stakeholders from around the organisation, information sessions held, and feedback sought. From the feedback received, the draft updated guardrails were updated before final recommendations were made to ELT. ELT approved the name change to Te Kauhanganui Critical Controls and endorsed Te Kauhanganui Critical Controls to go to the Board for approval. Te Kauhanganui Critical Controls (TKCC) were approved by the board on the 14th of August 2025. As part of this approval, a workplan to develop a ‘kete of controls’ to support the TKCC was approved.

16. The approved Te Kauhanganui Critical Controls are:

- a. Kaimahi will work no more than 6 out of 7 days.
- b. Kaimahi will work no more than 12 hours in one shift (or day), with the exemption of Election Day.
- c. Kaimahi will have a 12-hour break between shifts.
- d. Kaimahi will have regular breaks (10/30 minutes in accordance with legal requirements).

17. A working group, consisting of the Health, Safety, Wellbeing and Security Lead, the Senior Advisor, Health Safety and Wellbeing, the Workforce Planning Lead, the Regional Manager for Lower North/Upper South and four Regional Advisors was created to work through the kete of controls workplan. The workplan for this working group can be found in Appendix 1. Work on exemption processes and tracking of hours from this workplan is still underway.

Discussion

18. Recommendations for options that support TKCC need to be flexible enough to work across the country in vastly different areas of the business (National Office, Strategic Engagements and Partnerships, Enrolments etc) as well as across different electorates (rural/urban/regional). Due to this complexity, the choices available for control options need to be customisable and scalable so that managers can pick and choose as best

suits the risk exposure in their organisational area, region or electorate. This paper focuses on a kete for the temporary election workforce.

19. When looking at the kete of controls, two types of control emerge: those that proactively enable successful work whilst preventing fatigue, and those that reactively manage the risk after fatigue has occurred. It is preferable, in all cases, that proactive controls are selected to enable successful work and prevent fatigue from occurring. This is not to say that reactive controls are not effective, nor needed, rather that these controls should not be a first line of defence against fatigue, rather used only in situations where proactive controls are unavailable.
20. If we do not provide proactive support for kaimahi to prevent fatigue or provide tools to support kaimahi to achieve TKCC, then it is unlikely that the requirements of TKCC will be able to be met. We will have put in place a limit to the number of hours worked without the support required to enable kaimahi to successfully complete their work within that timeframe. In this paper, we propose to provide both proactive solutions to enable successful work, and reactive controls to help manage fatigue.
21. Over the last few Elections, in response to changes in the New Zealand electoral context, steps have been taken to mitigate organisational risks in multiple areas down to acceptable levels. Mitigating a risk in one area can increase the risk in another. When looking at how we are mitigating one risk, we should be looking holistically at the impact across all risks. The key is not to be trading off risks against each other, but to find different solutions that allow us to mitigate all risks to acceptable levels. We realise this may not be possible in all situations, and occasionally we will need to accept the risk instead. These exceptions should be infrequent and clearly accepted by the appropriate level of the organisation and cumulative risk assessed.
22. Whilst TKCC puts a barrier around stopping work after 12 hours, for our Election Delivery Temporary Workforce (EDTW) who are fixed term employees, the terms of their employment are for eight hours per day, 40 hours per week. If a fixed term employee was to work the full 6 days per week, 12 hours per day, they would be working 72 hours per week. In this instance, that is 32 extra hours for which they are unable to claim TOIL, or overtime (as this is excluded in their contracts). Below are a couple of examples of fixed term employee's earnings if meeting or exceeding TKCC:
23. A fixed term employee on 100% of band 16 (LSM/RRM rate) would earn \$3798.07 per fortnight, or an equivalent hourly rate of \$47.47. Working the maximum allowable hours under TKCC: 12 days in a fortnight, 12 hours per day = 144 hours per fortnight. This brings down their hourly rate to \$26.37 per hour. If no overtime or time off in lieu (TOIL) was offered, then this would bring the employees pay rate down to less than the living wage (\$28.95).
24. If that kaimahi was to exceed the TKCC and work 13.5 hours per day or 162 hours in the fortnight, it would push their hourly rate down to \$23.44 per hour. With no overtime, compensation or time off in lieu (TOIL) for these hours then this would be bringing the employee's pay rate down to below the legal minimum wage.
25. Whilst TKCC sets maximum hours and days of work, it does not address pay rates, TOIL or compensation for permanent or fixed term employees who continually exceed the hours of work set out in their contract. Whilst there are TOIL guidelines for permanent employees, these do not apply to EDTW fixed term kaimahi, who are unable to accumulate TOIL. It is therefore recommended that we continue to monitor actual hours worked (where possible) and ensure workloads are set at realistic levels that can be achieved within contracted hours – with the understanding contracts allow for some reasonable additional time worked above 40 hours a week. This approach supports the

wellbeing of our kaimahi and reduces the risk of potential employment relations risk.

26. It has been raised that alongside monitoring of hours (for which work is ongoing to develop), there should also be an anonymous reporting line where kaimahi can call to report if they are being required to work above and beyond TKCC to meet their work objectives or if they see other people working over the TKCC hours. We believe that the speak up line, if implemented, could also be used for this purpose.
27. In conversations with the TKCC workgroup, it is apparent that the three largest and busiest roles in the EHQ are the Electorate Manager (EM), the Rostering and Recruitment Manager (RRM) and the Logistics and Supplies Manager (LSM).
28. Whilst the Electoral Act 1993 puts statutory responsibilities onto Electorate Managers (as Returning Officers) that only they can complete, it is still the responsibility of the Commission to successfully produce an Election. If an Electorate Manager fails in their duties, this is an organisational failing. It is the Electoral Commissions responsibility to ensure they are successful and have contingency plans in place if they struggle or need further support.
29. The biggest challenge for these roles is workload and work pace. There is a large amount of work that needs to be completed, and a very finite deadline in which it needs to be completed within. This can be compounded by a lack of ability to successfully delegate work tasks. This can be for several reasons, including not having competent kaimahi to complete the work, not wanting to push more work onto other roles which also have high workloads, or simply wanting to make sure they are in control of what is happening (both early morning and in the evening) or to maintain consistency. EMs, LSMs and RRM's may also try to look after those in roles beneath them, supporting those kaimahi to take breaks and have days off, whilst working long hours and not taking breaks or days off for themselves.
30. In terms of risk exposure, the end of Election Day is the point as which there is the most exposure to the risks posed by fatigue to health and safety. It is the day with the most kaimahi on the road, both from mobile support, and every Voting Place Manager returning materials at the end of the night. By the time Voting Place Managers get in their cars to return voting materials, they will have already worked a 11 plus hour day at a minimum (calculated as starting at 7.30am, voting place open until 7pm, 30 minutes minimum for count and reconciliation). Many will work beyond 12 hours by the time they are ready to return materials. There can then also be a backlog at electorate headquarters to return materials, leading to extended waiting times before being able to finish for the evening (or early morning at this stage).

By-Election Trial Feedback

31. The trial of Te Kauhangānui Critical Controls during the By-Election presented an opportunity to understand how TKCC could be implemented in a partially representative scenario. However, without a means to successfully track the hours/days of all kaimahi, there is a lack of reliable data to show exactly the hours/days that were worked and whether TKCC requirements were met.
32. It is important to note that none of the kete of controls discussed in this paper were made visible or available to the team delivering this by-election, as they were still in development.
33. The Electorate Manager, Logistics and Supplies Manager, Rostering and Recruitment Manager all did their best to stay within TKCC requirements, however, did struggle due to the demands of their workload and responsibilities which resulted in a significant amount

of time worked outside of the TKCC requirements. A significant contributor to this was the context and service levels expectations associated with the Māori electorate By-Election. The Regional Manager believes that a Deputy Electorate Manager position and other controls proposed for the kete would have supported these managers to meet TKCC requirements.

34. The Regional Manager had to be constantly asking and/or reminding kaimahi about TKCC and sending them home if they had exceeded the hours. At times, kaimahi were confirming they were within the required hours, only for the Regional Manager to find out later, that they had, in fact, exceeded those hours. This points to the requirement for strong leadership to enable TKCC to be successful and change the culture around permissibility and acceptance of long work hours.
35. The Electorate Manager, Logistics and Supplies Managers, Rostering and Recruitment Manager and Voting Services Manager were all able to take at least one day off in the last week of voting. There was enough coverage with the next lot of leadership down to allow for this to occur. Voting Place Managers rostered to work on Election Day as well as during the advance voting period were able to also have a day off in the week before the Election.
36. A smaller team was used on the Sunday after Election Day, and they started later in the day. This did not meet the requirement of 12 hours between shifts and will probably be an area where issues will arise for GE26. This was, however, a shorter day and they were able to delay some tasks until the Monday which may not be able to be done in GE due to the larger volume of votes and the timeframes that are required to be met.
37. Having a smaller ratio of Mobile Support to voting places and voting places close together enabled them to better support those voting places and assist with pick up and drop off supplies.

Kete of Controls Approach

38. The kete of controls approach is designed as a kete from which regions and electorates can pick controls from that are appropriate and will work best in their areas.
39. It is recommended that a number of roles be trialled as part of this kete across the regions. In line with the kete approach, a workshop is proposed to be held with Regional Managers to work through which roles will work best in each of the electorates within their regions to minimise fatigue risks.
40. Because of this, no set number of each role has been recommended. However, the expectation is that a sufficient number of each role will be placed across the regions to gather adequate feedback post GE26 on the effectiveness of these roles, whilst also providing a targeted approach which puts these roles where they will be most worthwhile.
41. For non-role-based options, it is foreseen that Regional Managers will be 'keepers' of the kete. Electorate Managers will work with RMs to pick or request the right controls to implement in their region.

Roles to be funded from the Integrity Improvement Funding

42. As part of the Integrity Improvement Funding, funding was allocated for 64 Deputy Electorate Managers for a period of 1 month. This funding equates to \$892,113.
43. It is proposed that the following roles be funded from this pool of money. Exact numbers of each type of role will be determined in the workshop with Regional Managers where

other details such as number per electorate and length of employment will also be determined.

Deputy Electorate Managers

44. The first recommended position is to appoint a Deputy or Assistant Electorate Manager (DEM). This role would support the Electorate Manager in planning, establishing, and delivering voting services. They could also hold financial and or people leadership delegations from the organisation. During the Electorate Managers scheduled days off, they can step into the role to provide continuity of operations.
45. They would be able to be rostered to start later in the day on key weeks/days to ensure that the other HQ leadership roles are able to leave within the TKCC requirements as they will be trained and able to provide leadership continuity into the evening.
46. This role could not only provide continuity for their own electorate, but to other electorates as well. If there were illnesses in their own or neighbouring electorates, or if an Electorate Manager was to resign, or become incapacitated for any reason, they would be ready, trained and able to step up into the position of Electorate Manager.
47. They also provide contingency into the future workforce, and a pathway into the Electorate Manager role for future elections. Having Deputy Electorate Managers creates a larger group of people who have experience and training at an EHQ leadership level that they can bring back to future elections, increasing the potential candidate pool for Electorate Managers at future elections.

Out of scope

49. Deputy Electorate Managers could also be utilised in rural electorates that cover large geographic areas. Large rural electorates are challenging because of the dispersed nature of the populations and the large geographic distances that electoral staff must travel. Managing voting places that are a long way from the HQ is challenging and creates a heavy workload for electorate teams. When the population in an electorate is dispersed it makes it more complex for recruitment, logistics and support. In these areas, the DEM could operate out of a separate local area supporting and mitigating the large workload created by these large and geographically dispersed electorates.

Voting Services Manager as 2IC

50. Another recommendation is to extend the hours the Voting Services Manager (VSM) is funded for so that they can act as a 2IC for the EM.
51. The VSM is currently scheduled to start four weeks before the voting period and is currently funded only for part-time hours until the voting period (between 80-100 hours for the four-week period, depending on the electorate).
52. This role could be brought on full time from the outset (10 August to Election Day), to give them more time to work alongside the EM, RRM and LSM so they can get a good understanding of their roles. This will equip them to cover for each of these roles, enabling effective planning of rostered days off to meet TKCC requirements.

Additional Mobile Support

53. During the by-election there was a smaller ratio of mobile support to voting places and this enable better support to be provided to those voting places.

54. Having higher levels of mobile support available can assist meeting TKCC with the following:
- a. Ability to help busy voting places to cover breaks.
 - b. Ability to roster mobile onto morning and afternoon shifts to keep driving hours down,
 - c. Ability to support at hubs and secure storage with the return of materials, or to collect materials direct from voting places bringing down the backlog at EHQ,
 - d. Help at voting places struggling with the count or reconciliation,
 - e. Perform a quality assurance function in voting places observing vote issuing.

Returning Materials Officer

55. During a meeting with the Australian Electoral Commission, they highlighted the introduction of a Returning Materials Officer had the greatest impact on reducing fatigue at voting places. This role starts in the voting place later on Election Day (4pm) and supports the Voting Place Manager with the count and reconciliation processes. They then transport these materials back to EHQ,
56. This eliminates the need for the Voting Place Managers to drive (other than to return home) at the end of a long day.
57. In discussions with the TKCC workgroup, it was suggested that this role could also be used to collect materials from multiple voting places at the end of the night or be placed at a secure storage location, meeting place or hub to complete the checks on materials usually done at EHQ at the end of election night before returning to EHQ.
58. Ideally, candidates for these roles would be able to come out of the candidate pool already in use. E.g. they could be Voting Place Managers or other kaimahi who have worked in the advanced voting period.

Two Voting Place Managers in a Voting Place

59. Having two Voting Place Managers work on election day is another option to prevent end of night fatigue. This would involve having one voting place manager work in the morning, and another in the afternoon/evening.
60. Having a Voting Place Manager who starts later in the day will mean that they will have worked less hours by the time they need to drive materials back to EHQ than a manager who started at 7.30am.
61. Handover processes would need to be developed to support this option, to ensure the evening manager has the correct information they need to complete the count and reconciliation.

Other Kete Options Outside of the Integrity Improvement Funding

62. The following recommended kete of controls options fall outside of the integrity improvement funding.
63. We are asking for an additional pool of money to fund the options below. As previously noted, RM's would be the 'keeper of the kete' for these options, with EMs making a case

to the RM to access the funds for these options (apart from secure transport contractors).

64. It is recommended that \$214,000 be put aside to fund these controls. This full amount may not be required but will be sufficient to implement both proactive and reactive measures.

Out of scope

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Out of scope

Taxis

79. Taxis are a reactive control for use if fatigue has been identified to enable kaimahi to get home or to EHQ safely. If arranged in advance, they can also be a proactive tool.
80. It is recommended that a budget set aside for kaimahi to use taxis if fatigue is identified in kaimahi. It is noted that this option will only likely work in urban and some regional electorates.
81. If ten \$100 taxi chits were available for use per electorate, this would have a total cost of \$64,000. This is not to say that every electorate would need and/or use all of these.

Whanau collection

82. In some instances, if fatigue is identified, we may need to request that kaimahi are collected by their whanau. In these instances, as we are unable to offer fuel vouchers, it is recommended that kaimahi be able to be reimbursed for their mileage.

Hotels/Motels

83. In urban/metro areas there is the possibility that kaimahi could come into the HQ then stay the night in a hotel/motel. Certain staff could be designated in advance to stay based on travel requirements e.g. those with longer commutes, those who we know are going to be working very long hours on Election Day or need to back the next day e.g. Electorate Manager.
84. Can also be used reactively if kaimahi are identified as being fatigued and unable to find

alternative transport home.

85. Estimate of costs: If 5 rooms per electorate were used @ \$220 per night plus a \$50 food allowance (as per rate in travel policy) = \$86,400.

Setting up the voting place the night before election day

86. Where possible, setting up the voting place the night before Election Day is recommended (only the stands, desks and chairs). This will cut down the time needed to set up on Election Day, especially for voting place managers who may not have worked that day before.
87. This could be done by the voting place manager with help from another voting place staff member, or by teams for EHQ if possible. It will not be able to be done in all voting places due to distance, constraints on using the venue or availability of kaimahi. If there are concerns about the security of the venue overnight, it should also not be done.
88. This could be done by the voting place manager with help from another voting place staff member, or by teams for EHQ if possible. It will not be able to be done in all voting places due to distance, constraints on using the venue or availability of kaimahi. If there are concerns about the security of the venue overnight, it should also not be done.
89. For example, to set up 100 voting places the night before, with two people (the Voting Place Manager and one person on Living Wage) for two hours with one hour travel time and rental of sites set at \$200 for the extra time, would cost \$41,500.

Voting Place Managers days off in Election Week

90. Voting Place Managers who work the advanced voting period should either have Election Day off, or a day off later in the week of Election Day. Preferably the day before Election Day, and if that isn't possible, the Thursday or Wednesday. If they work the Friday, they could also work some of the other roles that start later in the day on Election Day e.g. mid-day start or returning materials officer.
91. This is to ensure that Voting Place Managers are sufficiently rested going into Election Day and haven't worked straight through the advanced voting period prior to working the long Election Day.
92. The requirement for this can be built into the information and training provided to kaimahi on rostering.

EHQ kaimahi days off in Election Week

93. As with Voting Place Managers, those who work in the Electorate Headquarters who will be working on Election Day should also have a day off during the preceding period to ensure that they are sufficiently rested going into the long working day that is Election Day.
94. This should be the same as with Voting Place Managers, preferably Friday where possible, or for those rostered to start late and work late on Election Day, and if not, then Thursday or Wednesday.
95. The requirement for this can be built into the information and training provided to Kaimahi on rostering.

Fatigue Risk Management Guidance

96. To assess fatigue where it is identified or where exemptions to TKCC are required, a fatigue risks assessment should be completed to see assess whether kaimahi are able to continue to work or should finish work and be supported home.
97. A fatigue risk assessment has been drafted. It can be found in Appendix 3. This draft will be discussed with the TKCC working group to ensure it is fit for purpose and easy to understand and use.
98. This fatigue risk assessment should be carried out by a nominated person in the Electorate headquarters.
99. From this fatigue risk assessment and exemption can be sought if it is found that the person can continue work. Work is ongoing on an exemption process.

Voting Place Placement

100. Below are a few examples of how voting place selection can impact on fatigue risk management. Voting Services takes fatigue risk management and TKCC into consideration as part of their assessment to determine placement of voting places. These examples are noted to simply highlight that, where a voting place is identified which might impact upon fatigue (due to low voting numbers and/or distance to EHQ), could consideration be applied to advanced voting or a mobile pop-up instead. This eliminates the fatigue risk associated with three kaimahi working in the voting place for 10+ hours (on Election Day) and a Voting Place Manager then driving to return materials.
 - a. Temuka had a Kupapa Maori Voting Place (KPMV) located at Arowhenua a 4-minute drive from central Temuka, which, also had 2 other voting places. The KPMV took 29 votes in GE23 which was a 52% reduction on votes taken in GE20. If 3 staff worked at the site (VPM, IO and VA) the cost per vote was \$39.67. While the importance of KPMV is acknowledged an opportunity could exist to reduce to one site in Temuka so that the options are one General VP and one KPMV for a town with a population of 4,840 (June 2024).
 - b. Rere School is located 28kms from the Gisborne General electorate boundary however is within the Napier General electorate. It is a 40-minute drive from Gisborne HQ but a 3-hour 30-minute drive from Napier HQ. Rere school took 34 votes in GE23 (a reduction of 53% from GE20) the cost per vote was \$37.52. There is a high risk of breaching TKCC due to the drive time back to Napier HQ. An opportunity could exist to understand if neighbouring electorate HQs can receive end of day materials to reduce driver fatigue.
 - c. Great Barrier Island had 2 voting places in GE23 – One at Port Fitzroy which took 55 votes and one at Okiwi school which took 66 votes, a total of 121 votes (46% reduction from GE20). If 3 staff worked at each site (VPM, IO and VA) the cost per vote was \$20.79. The distance between these sites is 4.5km or a 9-minute drive for an island population of 1,230 (June 2024). The only access to the island is a 30-minute flight (approx. \$260 one way) or 2-hour 30-minute ferry (approx. \$105 one way).
101. It is recommended that Voting Services continues to consider fatigue risk management

and TKCC when determining placement of voting places, and look into opportunities for other options such as an advanced voting place or mobile pop-up if they are identified for a particular site.

Supporting the Implementation of Controls Through Rostering

102. There are opportunities within the commission to improve rosters for kaimahi however a specific rostering tool is out of scope for GE26. Each of the 4 key areas roster in a differing way and some (VS HQ and Enrolments) do not use specific rosters at all. This is a risk as timesheets cannot be verified against adherence to roster, and the model exists as high trust. The recent by-election demonstrated that hours were not tracked effectively, and 55.45% of staff worked >12hrs on election day.
103. The M36 HQ roster (Excel) was designed to be used by Electorate HQ managers to roster their kaimahi. In initial discussions with some Regional Managers, they're not aware of this spreadsheet and therefore it is not being used. Instead, large whiteboards are often used at headquarters to understand where staff might be placed. The tool itself is very basic, only allows entries in 30-minute increments, and does not have a provision for scheduling or recording breaks, a critical point for effective rostering.
104. EMS is used for rostering Voting Place kaimahi and is effective in that it can link to training, payroll, roles and tasks. Once again there is no provision for rostering breaks rather just the start and end time of the shift. There is also currently no way for kaimahi to 'log in' and 'log out' to demonstrate adherence to their roster. This would be a great enhancement in the short term.
105. Enrolments currently don't have a rostering tool but would utilise Excel if required. This is fine for a small amount of kaimahi (<50) but becomes problematic when moving to the GE workforce profile. A specific tool (out of scope for GE26) would be the preferred option for rostering in Enrolments, with the right tool having the inbuilt logic to ensure the right capability and to assist in ensuring TKCC were not breached.
106. Find my Shift (FMS), a rostering tool was used by CPT (Overseas) during the GE20 and GE23. Overseas are recommending they use it again and the Workstream Services to Voters will bring this recommendation to Programme Board at a later date.

Rest and Meal Breaks

107. Upon becoming familiar with the Operations Manuals and the Voting Place PIMs it has been discovered that there is conflicting information regarding the taking of breaks. These conflicts range from the length of break through to whether kaimahi can leave the voting place during their break. Collaborative work is underway with the business owner to correct once noting and approval of this paper is finalised.
108. The Workforce Planning Lead will be developing training regarding rest and meal breaks in conjunction with the Training Team, and this will be delivered to the Electorate Managers at the Brentwood and supported further by eLearning and Webinars.
109. Mobile Support (MS) does provide cover for meal breaks where able to, but this also needs to be rostered to ensure the most efficient use of this resource. This resource could also be utilised as truly mobile whereby a VPM could call MS to advise they are going on break, leaves the phone with voting place staff who can call MS should any issues arise.
110. New Zealand Employment law requires that kaimahi take certain numbers of rest and

meal breaks dependant on the hours worked per day. These breaks are available in appendices.

111. We want to encourage kaimahi to follow a roster and therefore start/finish on time and take the breaks they are entitled to. While the law requires a paid rest break length of 10 mins, 15 min breaks are simpler to roster and adhere to with the limited rostering tools available, especially where using Excel to show a full day roster.
112. Kaimahi are allowed and, in fact encouraged, to leave the voting place during their breaks. This could be to get some fresh air, exercise or to purchase drinks/food at their own expense. There is no requirement to stay at the voting place once you begin your day.

Out of scope

[Redacted text block containing multiple paragraphs of information that has been removed for public release.]

Cultural Change Management and Leadership of TKCC

120. During conversations with the TKCC workgroup and stakeholders around the Commission, it has become apparent that working very long hours (12+ hours) is, at times, a cultural expectation for kaimahi.
121. TKCC provides a firm boundary around which to frame decisions and conversations regarding acceptable hours of work as the TKCC requirements were approved by the Board and expected to be implemented and adhered to.
122. For TKCC to be successful, the Commission's leadership will need to proactively support

and role model TKCC. This needs to be expected of all kaimahi in leadership positions throughout the organisation from ELT down.

123. TKCC is about support, not blame. We do not want to push long working hours underground or have them hidden. We want to be able to know where, and when they are occurring, so that we can proactively plan for how to address them for the future.

Next steps

124. Continue work on kete of controls for other areas of the Electoral Commission.
125. Update Commission documentation and training based on the agreed controls and processes
126. Determine escalation processes and means of tracking working hours/days.

Appendices

1. Te Kauhanganui Critical Controls Kete of Controls Workplan

Out d
pe [Redacted]

3. Draft Fatigue Risk Assessment

4. Legal Break Requirements

Rest and Breaks
The minimum length of breaks required by law is 10 minutes for rest (paid) breaks and 30 minutes for meal (unpaid) breaks. Here are the minimum number of breaks that must be provided to employees for each time
2 hours or more, but not more than 4 hours worked:
1 x 10-minute paid rest break
More than 4 hours, but no more than 6 hours worked:
1 x 10-minute paid rest break
1 x 30-minute unpaid meal break
More than 6 hours, but less than 10 hours worked:
1 x 10-minute paid rest break
1 x 30-minute unpaid meal break
1 x 10-minute paid rest break
10 hours or more, but no more than 12 hours worked:
1 x 10-minute paid rest break
1 x 30-minute unpaid meal break
1 x 10-minute paid rest break
1 x 10-minute paid rest break
More than 12 hours, but no more than 14 hours worked:
1 x 10-minute paid rest break
30-minute unpaid meal break
1 x 10-minute paid rest break
1 x 10-minute paid rest break
Second 30-minute unpaid meal break
More than 14 hours, but no more than 16 hours worked:
1 x 10-minute paid rest break
First 30-minute unpaid meal break
1 x 10-minute paid rest break
1 x 10-minute paid rest break
Second 30-minute unpaid meal break
1 x 10-minute paid rest break



[Redacted]

Fatigue Risk Assessment

Purpose

This assessment provides guidance in deciding on what fatigue prevention and management steps to take to ensure employees can safely perform their duties and ensure their health and safety is not put at risk. It also records evidence of the decision-making process.

It is important that employees and managers do not try to downplay fatigue or fatigue symptoms. Regular reminders of fatigue management strategies should be discussed with employees.

When to use this questionnaire

This assessment should be completed by a potentially fatigued employee, along with their manager, if:

- Employee reports symptoms of fatigue as outlined in the 'spotting fatigue' guidance.
- Employee discloses they are unfit or unable to undertake their work duties due to fatigue
- Supervisor or another employee has noticed employee is showing symptoms of fatigue as outlined in the 'spotting fatigue' guidance.
- they are required to work or drive beyond 12 hours (outside of election day)
- they are working beyond 60 hours a week.
- they are planning to work more than 6 days in a row.

Section 1: Employee Questionnaire

1. Is it likely you'll be working for more than 12 hours continuously (including breaks)?
Yes ☐ No ☐
2. Were you able to take rest breaks during your shift? Yes ☐ No ☐
3. Have you worked more than 6 of the last seven days? Yes ☐ No ☐
4. Have you worked over 60 hours this week? Yes ☐ No ☐
5. Have you had less than 6 hours of sleep in the past 24 hours? Yes ☐ No ☐
6. Have you had less than 12 hours sleep in the past 48 hours? Yes ☐ No ☐
7. Are you required to drive yourself to another location after finished work?
Yes ☐ No ☐
8. Do you have any other factors that may influence or increase your fatigue levels? e.g. medication or medical conditions. Yes ☐ No ☐
9. Was/Is your work excessively demanding physically or mentally? Yes ☐ No ☐

Section 2: Fatigue Symptoms

1. Have you reported, noticed or has anyone else noticed any of the following symptoms? *Note: it is acknowledged that some of these symptoms may occur for reasons other than fatigue.*

Physical	
• Yawning	☐

• Blurred vision, tired eyes or having trouble keeping eyes open	☐
• Head drooping	☐
• Extreme drowsiness or falling asleep or micro sleeps	☐
• Impaired hand-eye coordination	☐
• Feeling exhausted	☐
Mental	
• Difficulty concentrating on the current work task	☐
• Lapses in attention/difficulty remembering what you are meant to be doing	☐
• Poor information processing or decision making	☐
• Failure to communicate important information to a colleague/Poor communication	☐
• Risk taking behaviour	☐
• Failure to anticipate events or actions	☐
• Unintentional mistakes and/or repeatedly making errors	☐
• Anxiety	☐
Emotional	
• Been quieter or more withdrawn than usual	☐
• Lethargic or lacking in energy	☐
• Lacking in motivation to do the task well	☐
• Irritable with colleagues/customers/decreased tolerance	☐
• Having emotional outbursts/Mood changes	☐
• Uncontrolled Temper or aggression	☐

Section 3: Karolinska Sleepiness Scale

On the scale below, how alert do you feel?

1	Very Alert	☐
2		☐
3	Alert – normal level	☐
4		☐
5	Neither alert nor sleepy	☐
6		☐
7	Sleepy, but no effort to keep awake	☐
8		☐
9	Very Sleepy, great effort to keep awake	☐

Section 4: Assessment

Pick the rating based on the highest scoring of the below determination questions.

Risk Rating	Determination for Risk rating	Employee fitness for work	Remedial Actions
Extreme	- Answered Yes to 5 or more questions in section 1, Q's 1-10. or - Showing 6 of more symptoms of fatigue in Section 2. or - Scored 8-9 on Karolinska Sleepiness Scale in Section 3.	The employee is to be considered not fit for work	The employee needs to be relieved from duty as soon as possible. Alternative transport or driver and/or accommodation is to be provided.
High	- Answered Yes to 3-4 times in Section 1, Qs 1-10. or - Showing 4-5 symptoms of fatigue in Section 2. or - Scored 6-7 on Karolinska Sleepiness Scale.	If the employee needs to drive as part of their role, they are no longer able to drive, and alternative duties must be found.	Consider the option of releasing the Employee from duty, otherwise alternate duties may be required. Place employee on alternative duties. Consider if alternative transport or driver and/or accommodation is to be provided.
Moderate	- Answered Yes to 1-2 questions in Section 1 Qs-1-10. Or - Showing 2-3 symptoms of fatigue in Section 2. - Scored 5 on Karolinska sleepiness scale.	Can continue but reinforce fatigue management strategies	Personal risk mitigation strategies required: - Task rotation - Self-managed rest breaks - Adequate hydration and food intake
Low	No to all questions	Employee fit for work.	Monitor for symptom development.

Section 5: Decision Outcome

Based on the assessment conducted, the employee has been identified as:

☐ Fit for work

☐ Not fit for work

If the assessment determines that the employee is not fit for work, indicated by an extreme rating,

- the employee should be directed to cease work and leave the workplace.
- the employee should be provided assistance to get home if needed.
- the employee should not return to work until they another fatigue assessment demonstrates they are fit to return to work.

If the assessment determines that an employee is fit to continue work, you will need to determine what extra fatigue management strategies will be implemented to support the kaimahi. See section below.

Section 6: Management Strategies

Examples include:

- Day off tomorrow or later start
- Day or two off during this week.
- Hotel/Motel room stay (needs approval from ???).
- Taxi Home or driven home by another person (needs approval from ???).
- Maximum hours reduced e.g. 8 or 10 max.
- Maximum days a week reduced e.g. 5 days max
- Refer to EAP/Vitae
- Recommend seeing GP (if potential sleep/medical condition raised)
- Training recommended.

Detail what strategies are being implemented to manage the employee's fatigue:

Section 6: Sign off

Date of assessment: ____ / ____ / ____

Time of assessment: _____ am/pm

Electorate: _____

Assessment Reason: ☐ Observed Symptoms

☐ Self-Reported Symptoms

☐ Exemption required

☐ Required Assessment

Worker Acknowledgement:

Name: _____ Signature: _____

Date: ____ / ____ / ____

Supervisor Acknowledgement:

Name: _____ Position: _____

Signature: _____ Date: ____ / ____ / ____

Supporting documents

This assessment should be read in conjunction with the following documents:

- Health and Safety Policy
- Te Kauhanganui Critical Controls

On completion of this assessment, it should be scanned and sent to the health and safety inbox healthandsafety@elections.govt.nz.

1. **note** the contents of the Assurance Report

1. The purpose of this paper is to report on the key Assurance activities from 1 September to 30 November 2025.

2. The Assurance two-year programme of work was approved by the Board on 15 October 2025. This report provides an update on the key activities and progress against the plan.

Discussion / Ko ngā Mahi

Assurance Reviews

Out of scope

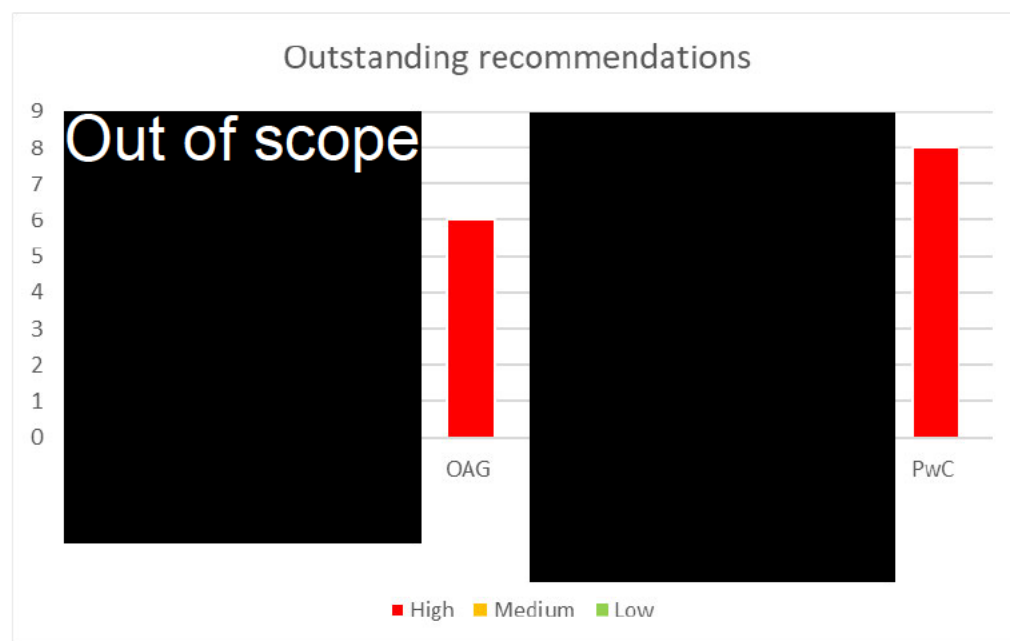
-
- | Category | Percentage |
|---|------------|
| U.S. should take action | 71% |
| U.S. should not take action | 27% |
| U.S. should take action but not at the expense of the economy | 10% |
| U.S. should not take action but not at the expense of the economy | 1% |

10. One recommendation from the OAG report and nine recommendations from the PwC report have been closed in the last quarter. A high-level management progress updates against each of the OAG and PwC report recommendations is detailed in *Appendix A*.

11. Out of scope

The following chart details the risk rating associated with the number of open recommendations.

Chart 1: Risk rating of recommendations



12. Action plans are in place for all recommendations, and we will continue to work with the action owners to ensure action plans are being progressed.

Out of scope

The following chart details the risk rating associated with the number of open recommendations.

Risk considerations

15. There are no direct risks associated with the Assurance quarterly update.

Next steps / Ko te Ara Tiatia

16. Continue delivery of the Assurance two-year programme of work and report an update to the Board quarterly.

Appendices / Ko ngā Whakapiringa

A: OAG and PwC status updates

Appendix A – OAG/PwC Management Updates and Progress

Status of progress made to 30 November 2025 - All High Priority Recommendations

OAG Recommendations	Owner	Management Updates	Due Date
1. OAG1: Review all vote counting and quality assurance checks and controls to address gaps and vulnerabilities	Chief Electoral Advisor (workstream owner for post- election)	A review of all vote counting and quality assurance checks and controls has been completed. New manual and automated controls for vote counting and data entry were tested during the Headquarters (HQ) Test held in July and the manual controls were further tested during the Tāmaki Makaurau by-election. These will be embedded into operational processes. Additional audit trail reporting in EMS and ERSA has also been identified and extra functionality in ERSA to raise the visibility and auditability of dual votes and post-Writ change information that is managed in the system. Monitoring the operation of controls will continue to be tracked under 11. PwC4.	Completed
2. OAG2: Review and update standard operations manuals and instructions to improve the clarity of information about quality control activities and why they are important and to clarify accountability and responsibility for carrying them out	DCE Operations (workstream owner for support for election delivery workforce) + relevant workstream owners for their quality control activities	Sysdoc main engagement complete at the end of Oct and handed over to the business as a draft. All content is now in GE26 templates. A staged review and release is planned and will be used during the simulation and dress rehearsal. Documents need to be ready for onboarding of the Electorate Managers commencing in February 2026.	March 2026
3. OAG3: Complete the end-to-end description of the election process and inter-dependencies of activities, and identify controls that support the election process	DCE, Strategy, Governance & Development	Processes for enrolment and post-election have mostly been documented, with risks, controls and dependencies identified. Work needs to be completed to link the processes and to further map other key steps identified to give an end-to-end view. Processes identified as a key dependency also need to be documented with some now underway including IT. A plan is currently underway to ensure resource is in place to further this work.	March 2026
4. OAG4: Review the personnel requirements for elections, the process for recruiting and training election workers and planning for contingencies (such as staff unavailability, system outages and fatigue)	Manager, People & Culture Director Voting Services Director, Enrolment	Workforce and Recruitment Plan presented to Programme Board (PB) on 26 June 2025. A subsequent paper for Temporary Election Workforce Numbers was presented to the PB in November. An analysis of resource requirements specifically for the Post Election period was presented following the Tāmaki Makaurau by-election. Additional resourcing has been identified as part of the Te Kauhanganui Critical Controls to address the risk of fatigue. An Enrolment Business Model has been developed to forecast resource requirements. Confirmation of assumptions and baseline is expected to be presented to the PB with costs in April 2026.	April 2026

OAG Recommendations	Owner	Management Updates	Due Date
5. OAG5: Review hardware requirements to ensure that electorates have sufficient technology to complete tasks required of them	Director Voting Services CIO, Manager Procurement	Hardware requirements have been reviewed and an additional \$1m for extra devices has been earmarked out of the tagged contingency funding. Finalisation of contracts and SoW are in progress. Awaiting confirmation of temporary workforce and Voting Place numbers to finalise.	March 2026
6. OAG6: Review the information technology systems that support the election process to ensure that they remain fit for purpose for both electorate and National Office functions	Chief Electoral Advisor CIO	Changes to processes and technology are progressing, including for the enrolment system (MIKE), key systems used by the Voting Services field and National Office team and SnapHire. Completion dates are variable. All systems will go through the Certification & Accreditation process.	March 2026
7. OAG7: Enhance risk identification processes and continue to apply programme and project management disciplines (including managing risks) throughout the election period	DCE, Strategy, Governance & Development	The risks for key teams have been identified and populated in the Enterprise Risk Register. The next stage is to support teams to identify their mitigations for high risks so that we have a better understanding of our controlled risk landscape. Work is currently underway to clearly identify and separate programme and operational risks.	30 Nov 2025

PwC Recommendations	Owner	Management Updates	Due Date
8. PwC1: Complete good practice process mapping and documentation (as per OAG3)		This is a duplication and will be tracked under OAG recommendation number 3.	Duplication
9: PwC2: Set enterprise and operational risk management expectations, tools, and governance. Consider alignment with appropriate risk standards such as ISO31000	DCE, Strategy, Governance & Development	Risk framework and Policy approved by the Board in April and published on the intranet	Complete
10. PwC3: Set risk tolerance for key risks to process set and define key controls that must operate	DCE, Strategy, Governance & Development	Risk, risk tolerance and controls work across the organisation is in process. Organisation wide risk register has been operationalised. Post-election and enrolment related tolerances are scheduled to be reviewed following the simulation.	March 2026
11. PwC4: Monitor operation and completion of key controls and capture clear and robust evidence that controls have been completed	Overarching - DCE, Strategy, Governance & Development	Work has progressed well to identify key controls and dashboards are in place or under development to provide further transparency and monitoring. An Assurance Matrix is currently in development to identify all key controls for the GE2026 delivery, and an Election Delivery Assurance plan will be presented to the March 2026 Board meeting.	March 2026
12. PwC5: Build proactive assurance processes to validate efficacy of controls and compliance	DCE, Strategy, Governance & Development	A two-year Assurance Plan was approved by the Board in October 2025. A quarterly report will be provided to the Board to monitor ongoing Assurance activities.	Complete
13. PwC6 EE1: The Transactions Status Report (TSR) is a key control for Enrolment Quality and requires improvement	Director Enrolment	The TSR enhancements were released early November. This includes preventing self-review for QA checks. The enhancements will continue to be monitored as part of the enrolment assurance and Integrity programme.	Complete
14. PwC7 EE1: Enhance quality assurance and oversight controls of enrolment by a) review roll cleanses scope and b) investigate based on further risks what potential preventive or detective controls can be put in place to strengthen the control environment	Director Enrolment	Roll cleanse gap analysis has been scoped and a review with the new Director when they are on board is planned to agree on how they are implemented. Processing controls embedded in Mike early November. Completed review of quality assurance checks and new dashboard monitoring transactions. Introduction of new sampling and quality assurance process. Overview QA dashboard to be included in Data Integrity Workstream. New Roll Cleanses expected to start in February.	Feb 2026

PwC Recommendations	Owner	Management Updates	Due Date
15. Pw8 EE2: Monitor operation and completion of enrolment key controls. For enrolment, build proactive assurance processes to validate compliance	Director Enrolment	Completed dashboard review, additional variance dashboarding to see planned vs actuals. A quality assurance plan has been developed and is currently with the workstream sponsor for approval. Additional quality dashboards are being developed to enable monitoring of the controls.	Feb 2026
16. PwC EE3: 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 deprioritise its capture and quality assurance over it to outside the busy electoral period	Director Enrolment	Investigations have been completed, and legislation changes that will change election and data requirements such as titles and occupation are now expected as part of the Electoral Amendment Bill in December. The relevant changes will be implemented when / if the Bill is passed.	Completed
17. PwC ER Overview 1: Introduce 'preventative and early detect' 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	Director Voting Services	System changes have been made to incorporate audit logging / trail improvements in the Electoral Management System (EMS). This was tested in the HQ Test held on 17 July. The Test Exit Report was considered by the Programme Board on 14 August and recommendations to fix identified bugs and make a limited number of remediations were approved. Work is also underway to develop further audit logging / trailing activities in the Electronic Roll Scrutiny Application (ERSA), as agreed by the Programme Board on 16 July.	March 2026
18. PwC ER Overview 2: Address 'preventative and early detect' control gaps	Director Voting Services	Risk & Control analysis has been completed for Enrolments and Post Election. Control gaps have been identified. Additional manual controls have been trialled and system enhancements to reduce the complexity of post-election agreed. This recommendation will be closed and monitored under PwC 4 to ensure controls continue to operate as intended.	Completed
19. PwC ER Overview 3: Introduce 'oversight, detect and mitigate' controls	Director Voting Services	Risk & Control analysis has been completed for Enrolments and Post Election. Control gaps have been identified. Additional manual controls have been trialled and system enhancements to reduce the complexity of post-election agreed. This recommendation will be closed and monitored under PwC 4 to ensure controls continue to operate as intended.	Completed
20. PwC ER Overview 4: Address 'oversight, detect and mitigate impact' control gaps	Director Voting Services	Development to improve issue management, increased data entry warnings, and other system changes to respond to gaps identified has been completed and tested through the HQ Test. This recommendation will be closed and monitored under PwC 4 to ensure controls continue to operate as intended.	Completed

PwC Recommendations	Owner	Management Updates	Due Date
21. PwC9 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	Director Voting Services	Initial planning has been completed including risks and controls analysis to ensure that all gaps are identified. Scenario planning activity is planned to be included in the Operational Delivery Simulation test (noting timing and scope is currently under discussion) but expected to be in March. New dashboards covering post-election activities are being established.	March 2026
22. PwC10 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	Director Voting Services	Functionality has been built in EMS to lock down results and provide audit trails where decisions have been made to change results data. This functionality was tested in the HQ Test on 17 July, with bugs and remediations captured in the Test Exit Report for the Programme Board’s consideration on 14 August. This will be further tested in the March simulation.	March 2026
23. PwC11 ER2: Reduce likelihood of failing to detect errors by reviewing processes at risk of data transposition errors	Director Voting Services	A paper recommending the development of further audit logging / trailing activities was considered by the Programme Board in July. It was agreed that these activities will be considered alongside other development requirements for prioritisation. Additional manual controls have been included in the process and have been successfully trialled.	Closed
24. PwC12 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	Director Voting Services	Functionality has been built in EMS that enable changes made to results to be reconciled back to the decisions made. This functionality was tested in the HQ Test in July. The effectiveness of controls will continue to be monitored under PwC 4.	Closed
25. PwC15 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	Director Voting Services	Documentation outlining the key controls that must operate is in progress as per OAG 3. Planning to progress the key controls analysis to be completed by end of 2025. Dashboard to monitor completion of controls are in development.	March 2026
26. PwC16 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	Director Voting Services	Options have been investigated to simplify processes. Some options have been discounted (split votes, scanning) as level of effort or system changes required will outweigh the benefits. New manual controls for the count of preliminary and official votes were tested during the HQ Test on 17 July and were also trialled during the Tāmaki Makaurau by-election.	Closed

Item # 04

Item: Post-election Decisions

To: GE2026 Programme Board

For: 18 December 2025

Prepared by: Adele s9(2)(a), Principal Advisor Voting Services

Recommendations / Ko ngā Whakataunga

It is recommended that the Board:

1. **Agree** to the post-election timeframes provided in **Appendix 1**, which includes:
 - a. [REDACTED] Out of scope [REDACTED]
 - b. A hard deadline relating to the completion of dual votes investigations.
 - c. An expectation that all counts will be completed by close-of-business Tuesday E+17, to provide two clear days to complete results certification, final checks and media presentations and releases.
2. [REDACTED] Out of scope [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
3. **Agree** to the following thresholds:
 - a. Duplicate results sets of fewer than 15 can be automatically resolved by EMS.
 - b. A margin of 500 or fewer votes is the initial threshold used to identify 'close electorates', with staff capacity and the overall risk profile of identified electorates determining the extent of support provided.
 - c. Thresholds described in the table in section 47, which covers the statistics that are included on the final results certificate signed by Electorate Managers
4. **Agree** to the responsibilities and accountabilities outlined in section 48, which relate to some of the new controls and the sign-off of final results.
5. **Agree** to the following new checks being incorporated into the suite of results controls:
 - a. Duplicate results set checking on Election Night
 - b. A comparison of the number of voters captured during the roll scanning process with the number votes counted per electorate, prior to the release of the official results.
6. **Note** the assurance activities outlined in the draft Post-election Assurance Plan attached as **Appendix 5**.
7. [REDACTED] Out of scope [REDACTED]
[REDACTED]
[REDACTED]

Purpose / Ko Te Taki

1. This paper requests decisions on processes relating to the management of Election Night and the Post-election period for the 2026 General Election (GE2026).

Background / Ko Te Tāhuhu

2. Work has been completed in the Post-election Workstream to help address critical risks raised by both the Office of the Auditor General (OAG) and PwC that the election results may not be complete, accurate, valid or delivered on time. In particular:
 - New manual and systems-based controls have been developed to ensure appropriate checks are in place to mitigate key risks.
 - Staffing levels have been reviewed and increased to ensure the right resources are available – and improved training and testing is planned to ensure these resources have the capability needed to effectively complete post-election activities.
3. Further decisions are now required to help with final planning for the management and assurance activities that happen both on Election Night and during the post-election period.

Discussion / Ko ngā Mahi

4. The following sections provide discussion on decisions that are required in relation to:
 - Post-election timeframes and management tools to be used during the post-election period (e.g. hard deadlines, agreed timeframes, etc.)
 - The management of the release of the preliminary results
 - Tolerances/thresholds to be applied to post-election support, assurance and sign-off activities
 - The detailed assurance approach for the post-election period
 - EAB considerations – in the instance that the bill is not passed into law (noting that at the time of writing the EAB is on the list of items to be considered under urgency by 13 December 2025).

Managing post-election timeframes

5. A calendar outlining post-election timeframes, developed by the Voting Services (domestic and overseas) and Enrolment teams, is attached at **Appendix 1**.
6. It includes the following new timeframe expectations, which were flagged in the Post-election Detailed Design documents considered in March this year:

- [REDACTED] Out of scope [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- Setting a hard deadline for completing dual votes investigations by Wednesday E+11, in the expectation that all possible effort has been made to complete the investigations by this point. The Electoral Act 1993 (the Act) requires Returning Officers to be satisfied that apparent dual votes should be allowed before including them in the count. Where a Returning Officer is unable to obtain such satisfaction, they will be instructed to disallow and extract those votes after this day¹.
- The expectation that HQs and CPT will complete all ordinary and special vote counts by close-of-business Tuesday E+17, to give a full two days of effort to the final certification and checking processes, which will include sufficient time for the communications team to prepare the material needed for the media conference (including the CEO's presentation).

Early validation and qualification regulations

7. It is noted that amendments to the Electoral Regulations are to be put in place in March 2026 to enable the validation and qualification of special votes to commence prior to Election Day.
8. Early validation has been built into CPT special votes processing. It provides significant timesaving as it enables the CPT to print and validate voting papers at the same time, rather than double-handle them at a later point. It also enables any validity issues to be identified early, so that preparations can be made to resolve them after Election Day. This will provide sufficient time for the team to contact and resolve votes before the E+6 deadline.
9. However, early qualification has not been built into CPT processes as its benefits are only expected to be realised primarily once full automation is implemented. At this stage, it is less advantageous within the targeted automation development that has been completed.
10. Targeted automation is heavily focused on easing the effort required to manage a large amount of paper, as it enables those voting papers that require a significant amount of additional effort (e.g. apparent dual votes) to be identified and removed from the main processing streams at the earliest point possible and in real time.
11. Adding early qualification to this mix would likely undercut the expected efficiency gains targeted automation provides. It would increase the level of complexity the team would have to manage at a time when voting is still underway. In practice, early qualification would deliver limited value because the majority of CPT votes are not available early enough for the process to be effective. Around 83% of votes are returned by upload, and approximately half of these typically arrive in the final four days of the voting period. In addition, OVP votes – which make up the remaining 17% of overseas votes – do not arrive until after election day. Bringing the qualification step forward would therefore occur too early for the bulk of votes and would not support the new early or real time notification.
12. Early qualification would also occur prior to the roll being closed and likely increase the number of votes forwarded to the Enrolment Processing Team (EPT) for qualification. This could require qualification stamps that have already been marked on a declaration to be

¹ If during the scrutiny and preparation of marked rolls or the checking of the special votes, it appears the same voter has been issued more than 1 voting paper, the Electoral Act 1993 (the Act) requires the Returning Officer to disallow every vote given unless the Returning Officer is satisfied that only 1 paper was lawfully received by the voter and that that voter was in no way concerned in the issue of the other ballot paper or papers in which case the Returning Officer must allow the vote of the voter and disallow the other vote or votes.

modified and votes where qualification has changed being found and reallocated to the correct count.

13. However, this regulatory change will be an important one for the CPT if/when its processes are fully automated as it will enable end-to-end validation and qualification to occur within the system.
14. Neither early validation nor qualification are currently built into electorate HQ processes. HQs do not have the same risks as the CPT due to the lower volumes of special votes they receive and the lesser time it takes to process special votes. It is also less advantageous as the majority are cast in the final four days of the voting period and due to repatriation requirements
15. Both early validation and qualification would be both difficult and risky for electorate HQs to implement, due to the additional security and logistics that would be required to manage the processes safely and effectively while they are intensely focused on delivering voting services and preparing for all Election Day activities.

Out of scope

Out of scope

Thresholds and accountabilities

32. A high-level view of the new controls that have been developed in the EMS results module is provided in **Appendix 4**. Some of these controls require thresholds to be defined and mean that accountabilities around activities can be redefined.

Duplicate results threshold

33. New functionality has been developed to ensure two or more results sets that are exactly the same are identified early (at the point when a second results set is entered) and included on the new 'Issues Management' screen for the Electorate Manager to resolve as part of their quality checks. This has been designed to pick-up incidences of results that have been mistakenly entered twice – which is particularly important for special votes where there is no preliminary count for comparison. The key situations where this issue occurs are where the same results data is entered for:

- The advance and Election Day results sets for the same voting place or for special votes
- Two different phases for either a voting place or special votes
- Two different voting places that have similar names
- Two different electorates within the same voting place.

34. Duplicate results sets are relatively common, particularly for the smaller counts of 'fewer than six votes' or counts for Māori electorates. Duplicate results are relatively common for Māori electorates as their votes are spread across large geographical areas, between fewer candidates.

35. For example, the Te Tai Tonga data from GE2023 shows that 435 of the 1,112 results sets generated were the same as one or more of the other results. The majority of these were for counts totalling fewer than 15 votes. As a comparison, the results data for the Northland and West-Coast Tasman electorates were also examined, with no duplicate results sets found.

36. Given the potential for a significant number of duplicates to be identified and the time it takes should an investigation for every case be required, a threshold for requiring the Electorate Manager to investigate the issue is needed. Based on the principle that this functionality will be particularly helpful for special vote counts, which are larger, the

recommendation is that the duplicate results threshold is applied to counts of 15 votes or over. For Te Tai Tonga, this would have resulted in only one pair of results being highlighted for investigation.

37. Duplicate results under the threshold will still be identified and captured on the Issues Management screen, but they will be automatically resolved by the system. This provides transparency that the duplicate results exist and enables spot checks to be easily undertaken to ensure the control is working as designed. Such spot checks are included in the detailed assurance activities described in **Appendix 5**.

Close electorates margin

38. As noted in the Post-election Staffing paper considered by the Programme Board on 9 October 2025, thresholds and an approach for determining which electorates will be treated as 'close electorates' after Election Day is needed, as the expectation for GE2026 is that they will receive a higher level of support and oversight.
39. The margin of the three electorates that were subject to judicial recounts at GE2023 ranged between 54 and 495 votes on Election Night. A further three electorates that did not have judicial counts had similar margins of between 30 and 487 votes.
40. Ideally for GE2023, all six of these electorates would have had NO staff closely following and supporting their processes, which would include an on-site visit to undertake assurance checks particularly on the key post-election activities where discretion is being applied.
41. This requires the Commission to have the capacity to do this, which may be constrained if other events have occurred that require resourcing after Election Day. It is an ongoing discussion between Legal, Regulation and Policy (LR&P), Voting Services and the Enterprise Risk & Assurance Team about who in the organisation will have the capacity and capability to do this. It is also noted that Regional Advisors will be available and expected to provide support to these electorates as they undertake their processes.
42. For capacity reasons, it is recommended that 500 votes is used as an initial threshold for understanding which electorates may require a higher level of oversight, but that should then be considered against staff capacity and the overall risk profile of electorate(s) (e.g. the experience of the Electorate Manager, other issues that may have occurred in the electorate).
43. Tied in with this is the strong caveat that recounts are not always driven by margin. Recounts undertaken in both GE2014 and GE2020 related to electorates that had higher margins, but recounts were requested due to concerns about the management of the electoral roll for those electorates and there is no provision in the legislation for the Judge to consider whether an application should proceed. This means that it will always be necessary to consider other factors when looking at close electorates – including the number of special votes, political interest and capacity of staffing across identified electorates.
44. It may be that electorates with a larger margin will end up receiving the additional support – or that support is also provided at different levels to different electorates, e.g. from providing in-person support to being readily available in regular online meetings.
45. It is noted that a close result may also apply to the overall count of party votes. Work has been undertaken to create a spreadsheet that enables the 'sensitivity' of the party vote count

to be easily understood. This will be a useful tool to use in the final few days of confirming the official result.

Early warning signs

46. The Voting Services Team creates a 'heat map' that compares a number of the statistics that are included on the final results certificate for each electorate. The purpose of this is to identify any potential outliers, which provide an additional layer for identifying processing and data entry errors. This work provides a final sense check over the detailed results statistics.
47. The below table outlines the categories included in the heat map, with an explanation of the early warning sign they provide and the recommended threshold to be applied before the EM is asked to investigate the potential issue.

Category	Early warning sign	Agreed threshold
Special vote disallowed categories		
a. Not enrolled	A wide variation is expected between electorates. As all non-enrolled voters are confirmed by data in MIKE by the EPT, no thresholds are required.	No threshold required.
b. Vote received late	High numbers can indicate the guidelines have not been applied correctly.	>10 votes (The majority of electorates had <10)
c. Not signed by authorised witness	High numbers of these categories can mean that the guidelines have been incorrectly applied, though it is also noted that these numbers can be impacted by Overseas declarations.	>10 for domestic special votes.
d. Not signed by voter		
e. No ground stated	High numbers can mean that the guidelines have not been correctly applied.	>10 votes
f. Dual votes	- Either '0' or high numbers can be a flag that decision-making should be checked - A '0' may indicate that a finalised dual vote has not been correctly entered into ERSA.	Either 0 or >15 (most electorates have between 1-10).
g. Post-writ deletions (PWD)	There are very few PWDs. Too many likely indicates incorrect data entry in ERSA.	>3 (The majority of electorates had less than 3 for GE2026)
h. No declaration enclosed	High numbers could indicate an issue with vote issuing that needs to be investigated	>3 (The majority of electorates had less than 3 for GE2026)
i. No ballot paper enclosed	- This does not happen often in the domestic space but is relatively common for overseas votes. The number may increase with the move to time-boxing the resolution of issues for overseas votes to Friday E+6. - High numbers could indicate an issue with vote issuing that needs to be investigated.	>10 (The majority of electorates had less than 10 for GE2026)
Other		
Ballots issued not returned	'0' most common. A high number can indicate an issue with reconciliation in a voting place.	>5 votes for an individual count to be questioned further.
Ordinary disallowed votes	'0' or high numbers may mean that either dual vote decisions or their data entry need to be investigated.	'0' or >10 votes.
Party Vote Only counts	Numbers can vary significantly between electorates for good reason (e.g. high unenrolment), but like electorates should have a similar number of party votes.	>10% difference between like electorates.

Responsibilities and accountabilities

48. The below table provides recommendations about the responsibilities and accountabilities of key post-election roles in relation to:

- The new issues management functionality in EMS
- The sign-off of final voting place and electorate results.

Functionality	Process Leader	Post-election Manager	Electorate Manager
Issue Management Screen	No permission	Complete notes on action taken	Resolves identified issues
Lock on results sets	No permission	No permission	Can unlock and change results sets
Extraction functionality	Able to remove votes from the counts	Able to remove votes from the counts	Able to remove votes from the counts
Voting place results	No accountability	No accountability	Signs-off voting place results alongside a Justice of the Peace
Final electorate results	No accountability	No accountability	Signs-off the final electorate results alongside a Justice of the Peace

49. A key principle is that Electorate Managers have increased accountability for their results, including for individual voting places, that both the Official Count Process Leader, Post-election Manager were allowed to sign-off in GE2020 and GE2023.
50. However, it is noted that the activity of signing off the voting place results will be significantly more effort for larger, rural electorates than it will be for some smaller, urban electorates.
51. For example, for GE2023 the urban electorate of Kelston only had to sign-off 52 results sets, whereas Northland had to sign-off 220, based on the number of voting places each electorate had and that each voting place had a count for both a Māori and General electorate.
52. For this reason, Regional Managers will be encouraged to work with their rural electorate Electorate Managers to ensure they have sufficient resourcing to provide relief in other areas of activity.

Additional checks/controls

53. The below considers two additional checks recommended to be included in the suite of controls that support the delivery of an accurate, valid, complete and timely results.

Duplicate results set check on Election Night

54. National Office's Election Night reasonableness checking is currently run via the Vote Checking Report, which provides an indication of which results may have issues as the:
- Distribution of candidates or parties within a result differs more than the expected standard deviation from the other results (this is currently set at a 2.5% deviation) – potentially showing that results have been entered against the wrong candidate or party
 - Number of ballot papers counted does not match the total number of ballot papers issued (the reconciliation number) – potentially showing that votes have been left uncounted or are lost.
55. The Vote Checking Report helps pick-up errors in data entry, although on the whole, a limited number of changes are made as a result of it. Often:
- The largest results deviations are correct as they either fit with the location of the voting place within the electorate's overall demographic profile or are for very small counts, where one vote can significantly change the distribution
 - Reconciliation issues that are identified cannot be fully resolved until the post-election period when the materials have been received back at the HQ and staff have the time to take a deeper dive into the difference.

56. As manual controls around the count, capture and data entry of results will be rolled out for GE2026, it is hoped that even fewer errors are identified, as more are prevented at source.
57. Nonetheless, the new functionality that helps identify duplicate results sets in the official count is also available as a check on Election Night results. This would identify potential issues that are not picked up through just looking at vote distribution. It is recommended that the use of this check is included in the March simulation, to determine its effectiveness.

Roll mark-off

58. A check to compare the number of votes marked off the roll in ERSA and the number of votes counted in EMS has been made in previous elections. However, this has been undertaken after the official results are released, prior to the release of the detailed E9 statistics.
59. The check has shown that a discrepancy between the roll marks and votes counted is common, often with between 1-2% fewer roll marks being captured for an electorate than votes counted.
60. This information can indicate that either:
- A used roll has not been scanned
 - Issuing officers across voting places have not always correctly marked voters off the paper roll.
61. The data platform provides the opportunity for this check to be made much more easily than in the past, as it can readily connect ERSA and EMS data. This will enable early identification of the completeness of the roll prior to the release of official results, so that electorates can be asked to undertake additional checks that all of their used rolls are scanned.
62. The ideal would be for the discrepancy in the data to be as minimal as possible – but it is noted that improving roll data could take an enormous amount of effort if the issue cannot easily be resolved as an issue with data missing from one or two rolls.
63. Data comparison at the voting place level will be difficult and subject to error, as it relies on the issuing point numbers assigned to rolls in ERSA to be of high quality. This means that data will be provided at the electorate level rather than showing discrepancies at the voting place level. Voting place level data could enable the electorate to focus in on cross-checking roll marks against the sheet used in the voting place to record page and line numbers for scrutineers (Form V). However, without being able to target specific voting places, the extent of effort this would require would be prohibitive to achieve improvements in the quality of the master roll within post-election timeframes.
64. Therefore, it is recommended that 1% or more is used as the threshold for requesting an electorate to undertake investigations into the quality of its roll, with required investigations and remediations focused on checking those rolls marked as 'unused' to confirm they have not actually been used and need to be scanned.

Assurance Framework for Post-election

65. A draft of the Voting Services' Post-election Assurance Plan is attached as **Appendix 5**. This provides details on the quality assurance, control assurance and monitoring activities currently planned to be undertaken during the post-election period by roles in both the Voting Services field and National Office team.
66. The plan is based on the operational delivery phases that are being used as a mechanism for GE2026 to manage the election and understand readiness at critical points (e.g. the move into the voting and post-election periods in particular).
67. This work will also sit alongside the Operational Delivery Plan that will guide delivery expectations for the Voting Services field and NO team's work for GE2026.

Out of scope

Next steps / Ko te Ara Tiatia

70. If agreed, the above timeframes and thresholds will be captured in the Voting Services' Operational Delivery Plan that is currently being developed, alongside other triggers and early warning signs that indicate where planned timeframes may be going off-track. The Plan will include pre-agreed interventions/treatments that will be used to bring timeframes back on track.
71. All post-election activities, including the delivery of the Preliminary Count, will be included in the Post-election Simulation, currently scheduled for the end of March. This will include the activities discussed in this document (if agreed in some cases). Note: the scope for the simulation will be provided separately by the Election Readiness Workstream.

Appendices / Ko ngā Whakapiringa

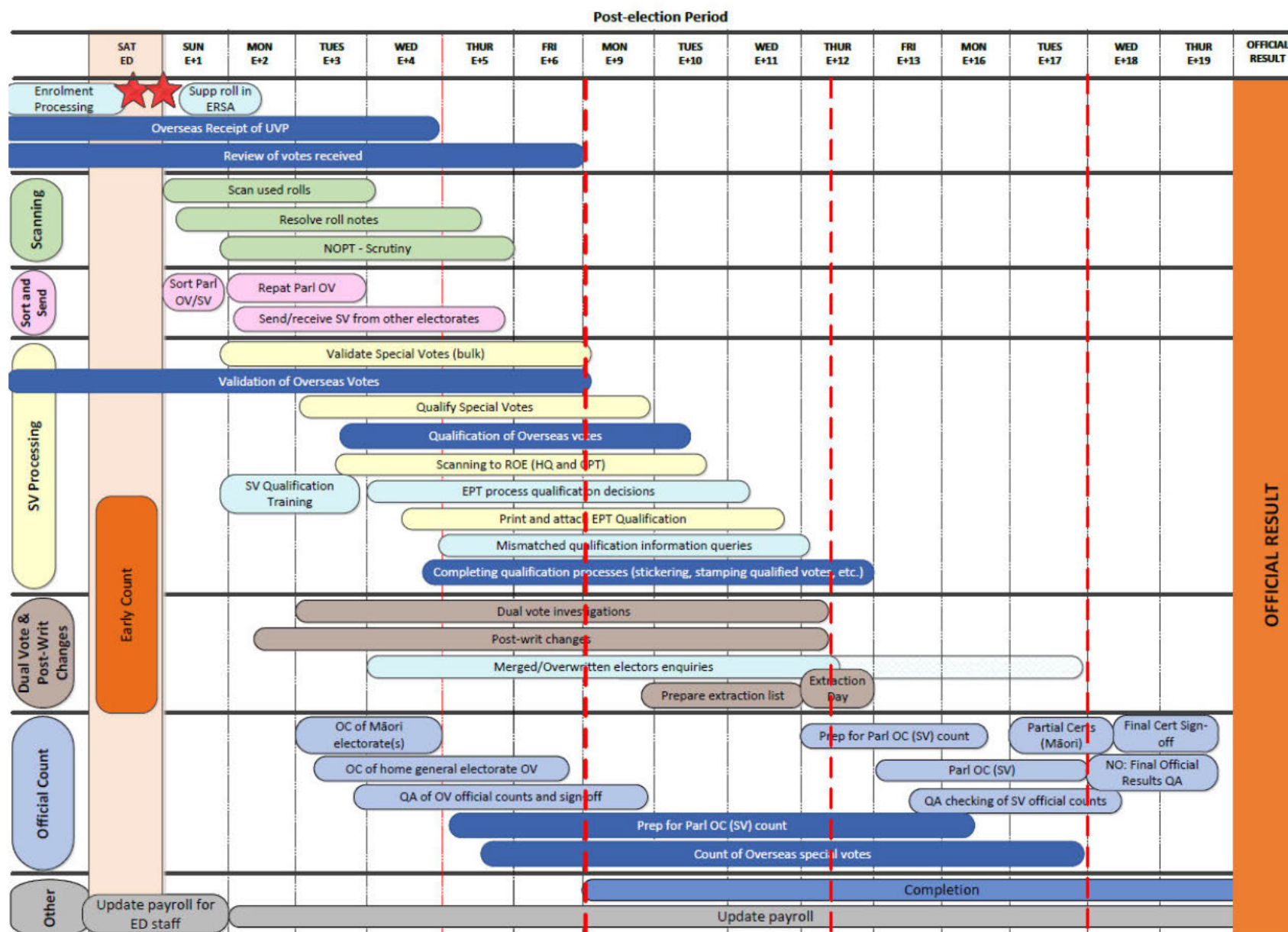
1: Proposed Post-election Timeframes

3: Table of special vote estimates and final numbers

4: 2023 and 2026 Results Process Flow

5: Draft Post-election Assurance Plan

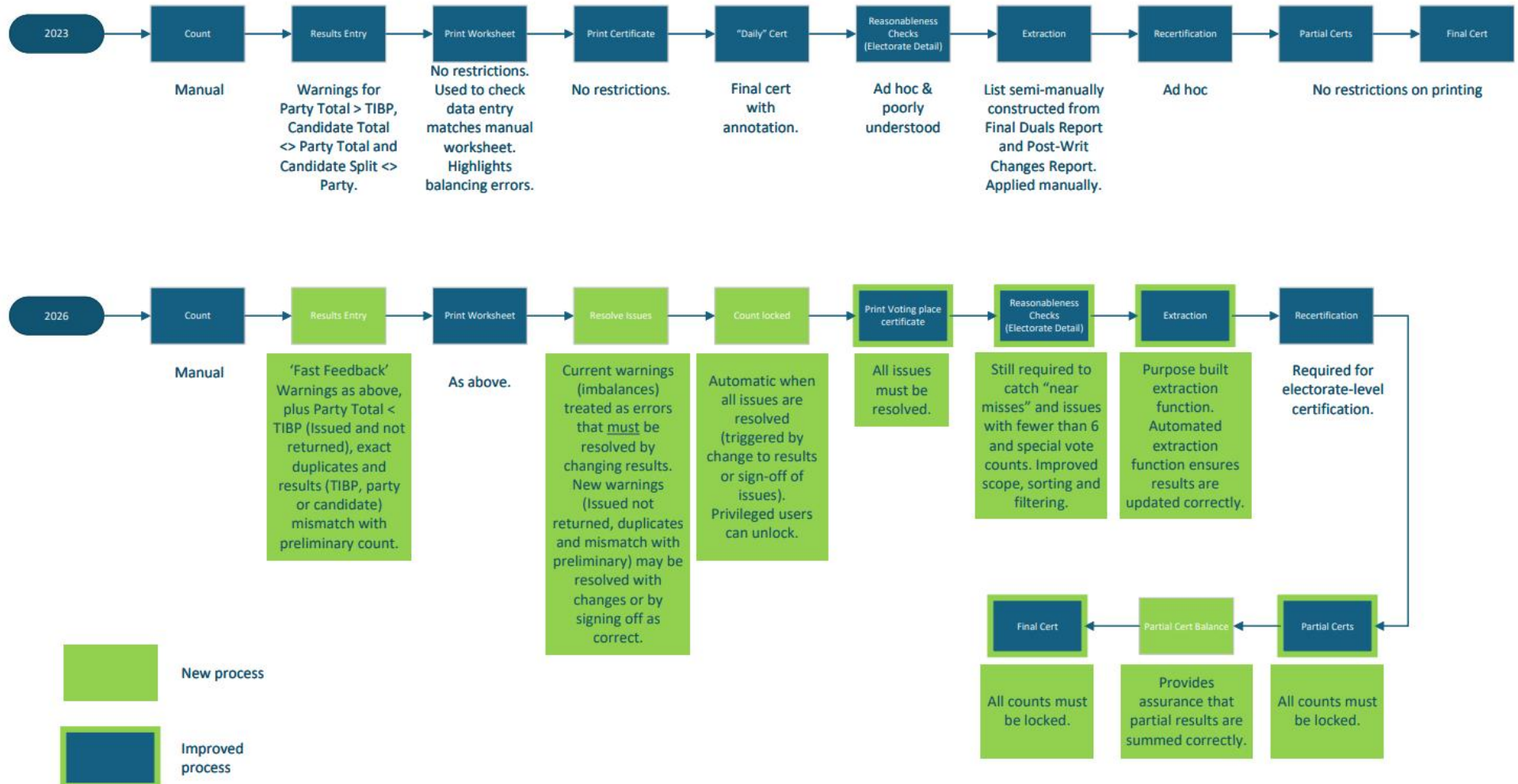
Appendix 1: Proposed Post-election Timeframes



Appendix 3: Table of special vote estimates and final numbers

Election	ED specials estimate	Final specials number	Difference (% of estimate)
2014	293,130	331,005	37,875 (13%)
2017	384,072	446,287	62,215 (16%)
2020	480,000	504,621	24,621 (5%)
2023	567,000	602,488	35,488 (6%)

Appendix 4: 2023 and 2026 Results Process Flow



Appendix 5: Post-election Assurance Plan

Post-election Assurance Plan

Voting Services

DRAFT – V0.1

1. Introduction

Delivering trusted elections depends on knowing our key risks, having effective controls, and proving — through evidence-based assurance — that those controls work. Our collective goal is to deliver trusted results through sound processes, transparency, and shared responsibility.

The clear objective of the Post-election phase is to deliver timely, accurate, valid and complete results.

2. Document Purpose

This document provides an outline of the key, first-line assurance activities that will be completed during the GE2026 post-election period by the Voting Services field and National Office team.

This document links to the following:

- **Voting Services Operational Delivery Plan** – this plan details the specific risks that are being managed at each phase of election delivery, including the post-election phase, outlining how they are being controlled, early warning signs and triggers that will show if processing is going off-track, and pre-agreed treatments and/or interventions to undertake to get back on track, if required.
- **Assurance Matrix** compiled by Enterprise Risk and Assurance team.

3. The Post-election Environment

Work has been undertaken to understand the risks, controls and assurance needed during the post-election period to ensure that Voting Services is able to meet the critical objective of delivering accurate, valid, complete and timely election results.

Risks

The key risks that are being managed during the post-election phase have been taken from the review undertaken by PwC after the General Election 2023. These are:

- **Completeness** – Not all eligible votes cast are included in the counts (preliminary and official).
- **Accuracy** – Votes are not correctly recorded against the candidate and/or party vote
- **Validity** – Ineligible votes are not removed from the Official Count
- **Timeliness** – Key tasks are not delivered in line with the post-election timeline
- **Security** – Access to documents and systems is not restricted to only those who have an appropriate business need.

Controls

Key controls are in place to manage the above risks. These controls relate to:

- Well-built, tested and described processes, which are supported by well-built, tested, communicated and supported training
- Well-built and tested systems that hold checks and balances on critical tasks
- A system of checklists and spot checks, used by different levels of staff, to ensure that critical tasks have been completed, on-time and within quality expectations (with a focus on validity and accuracy).

Assurance

Assurance is derived from obtaining particular information, at a particular time, with a specific scope, frequency and independence.

Assurance is how we understand that the controls are:

- Working as designed
- Being followed by Voting Services staff as they undertake post-election activities.

It is Voting Services' role to provide first-line of assurance that key controls are working as designed and planned in the processes and systems that are used by the Voting Services field. To do this Voting Services will:

- Undertake a simulation of all post-election activities to obtain a clear understanding that the design of the process is enabling the Commission to meet its objectives
- Check throughout the post-election phase how processes are being completed. This is done by:
 - Progress monitoring – at the regional and national level
 - Spot checks – to check quality (e.g. decisions are made in line with guidance)
 - Targeted process and system checks – to ensure processes are being followed (e.g. steps are not being missed, the right person is doing the right task at the right time)
 - The escalation of risks and issues.

A key part of this is about ensuring there is clarity about who does what and when. Key roles for those involved in first-level assurance are as follows:

- Electorate Managers (EMs) – ensure their kaimahi are following processes, they are on track to deliver, quality is being met, and key questions are asked, answered and managed where necessary (e.g. staffing health and safety).
- Headquarters staff – complete processes and checklists following instructions in the manual and their training
- Regional Advisor (RA) – undertake spot checks on quality of decision-making at HQs.
- Voting Services Team (VS Team) – monitors completeness of processes across the electorates.
- Senior Analyst Operations Risk & Assurance (Ops R&A) – undertakes targeted, in-depth checks that processes are being followed – including that expected systems controls are continuing to operate as expected when being used by the field.
- Regional Managers – monitor completeness in their regions, raise risks and issues and identify patterns across their electorates.

Voting Services Detailed Assurance Matrix

Activity	Objective	Risk focus	What we expect to see	Early Warning Signs/Triggers	Voting Services (Domestic and CPT)	Ops R&A	Regional Advisors	Process controls (HQ and CPT staff)
Preliminary Count (Early Count and voting places)	Return trusted results on Election Night	Validity	- Count only includes eligible votes - Counts from voting places are confirmed			Process compliance check: Checks that processes are being followed as expected, e.g.: Manual count and results capture checks followed		- Informal votes are identified and removed from the count. - EM checks informal votes identified in the early count
		Completeness	- All counts have been completed and entered into EMS - All votes have been counted - All reconciliations issues have been identified (if not resolved) - All identified errors and anomalies have been resolved	Results entry dashboard shows a high no. of results are not entered by an agreed time (see Operational Delivery Plan)	Monitor: - Electorate level dashboards (Dashboard is 'green' and 100%) Complete checklists: - All results checks have been completed - Media release checks are complete (with D&I and Comms Team)	- Transmission and capture of data checks followed - Double-entry verification of count data before submission - Supervisor checks and signs-off all results - QA checklists applied before final data transmission.		Post-Election Manager (PEM): - Monitors progress of results entry (EMS dashboard) - Undertakes reasonableness checking - Understands outstanding issues being taken into post-election
		Accurate	- All cast votes are counted and allocated to correct voting place, candidate or party - EMS calculates the combined results correctly - All records are accurately recorded - EMS provides warnings if data does not match (e.g. reconciliation and number of votes counted, candidate and party vote counts)		Monitor: - Duplicate results sets - Results reasonableness and reconciliation issues via the Vote Checking Report	Confirmation that system is working as expected: Automated alerts for data inconsistencies or missing inputs		VP and HQ staff follow set processes to count votes. This includes new manual controls, providing a double-check on key parts of the count, capture and data entry of votes.
		Timely	- Results are released within legislated/agreed timeframes - Timeframes for capturing and checking results data are clearly stated and trained.	- Electorates have not started entering advance vote counts by 7:10pm. - Electorates have a high percentage of outstanding votes to enter at 9pm.				
		Security	- Access to the early count is restricted to only those who are allowed by the Electorate Manager - Access to documents and systems is restricted to only those who have an appropriate business need		Monitor: Receipt of ballot boxes, noting exceptions as some may be in-transit overnight		Spot check that early count security requirements are being followed (noting they are likely to only be in one location for the day).	Ensures ballot boxes are received back into EMS materials tracking module
Materials tracking	All materials are accounted for at HQ	Validity	Logistics Plan is being implemented by electorates				- Quality review of Logistics Plans - Spot checks that plans are being implemented as expected - Provide assurance that materials are being repatriated effectively across region.	LSM: - Enacts Logistics Plan as agreed and follows process instructions. - Registers when materials tracking reports are run.
		Completeness	- All materials are returned back at HQ - All special vote numbers are entered correctly into EMS	Dashboard shows not all materials returned by E+2	Monitor EMS across electorates: - Material returned to HQs (check of Material not returned report) - Completion of SV Initial Load by all Check - Checks that initial load is entered correctly before pressing 'send'		Monday E+2 checklist: Confirm all electorates have sorted and entered their SVs into EMS, and SVs are being couriered for repatriation.	PEM Sunday E+1 checklist: - Includes check that all voting materials are returned using EMS: 'Materials not returned to my HQ report' - Includes sign-off that all critical materials are accounted for.
		Accurate	All materials (ordinary votes taken, electoral rolls, unused voting papers and special votes taken) are correctly returned from voting places to home electorates so that they can be counted.		Monitors EMS: SV received numbers to check progress of repatriation through to completion			PE E+5 checklist: Includes sign-off that all repatriated SVs have been received.
		Timely	Right materials when they need them	Dashboard shows materials tracking and repatriation timeframes set out in the				

Activity	Objective	Risk focus	What we expect to see	Early Warning Signs/Triggers	Voting Services (Domestic and CPT)	Ops R&A	Regional Advisors	Process controls (HQ and CPT staff)
				Operational Delivery Plan are going off-track				
		Security	Chain of custody is monitored via EMS and through manual 'tracking notes' and checklists	Dashboard shows not all SVs received				
Scanning of electoral rolls	To provide data on who has cast votes	Validity	All used rolls are scanned	- Dashboards highlight high number of used rolls are not scanned - Ops R&A review shows issues with process compliance				Process Leader (PL): - Completes daily checklist (focused on completing processes and their timeframes). PEM: - Completes daily checklist (focused on progress and completing some quality checks)
		Completeness	All roles are scanned and no outstanding roll notes to resolve	Dashboard highlights progress is not meeting expectations	Monitor ERSA: - All rolls are scanned - All notes are resolved			
		Accurate	- All electoral rolls have the correct status and ERSA fully captures relevant information from scanned rolls - All issues have been identified correctly			Process compliance check: - ERSA is correctly capturing roll marks - NORST is correctly capturing roll data at NO	Spot checks: - Used/unused electoral rolls are correctly flagged - Notes are resolved	
		Timely	All rolls are scanned within required timeframes	Timeframes set out in the Operational Delivery Plan are going off-track	Monitor: Processing progress			
		Security	Access to documents and systems is restricted to only those who have an appropriate business need				Spot check that security requirements are being followed.	
Official Count (OV)	Return accurate & trusted results within legislative timeframes	Validity	- Count only includes eligible votes - All voting place certificates have been signed by the EM & JP	Ops R&A review shows issues with process compliance		Confirmation that process is being followed as expected in selected HQs and the CPT: - Manual count checks followed - Transmission and capture of data checks followed - Double-entry verification of count data before submission - Supervisor checks and signs-off all results - QA checklists applied before final data transmission.	- Spot checks that informal votes have been correctly assessed. - Spot checks on dual votes and post-Writ changes (noted below)	
		Completeness	- All counts have been completed and entered into EMS - All votes have been counted - All reconciliations issues have been resolved - All identified errors and anomalies have been resolved	Results entry dashboard shows a high no. of results are not entered by Friday E+6	Monitor: - Electorate level dashboards (Dashboard is 'green' and 100%) - All issues raised in issues management screen are resolved by EM.	Confirmation that system is working as expected: - Automated alerts for data inconsistencies or missing inputs, including 'fast feedback' process. - EM unable to print voting place certificate if outstanding issue to resolve. - EM unable to print final certificate if outstanding issue to resolve - Issues identified in the Issues Management Screen are also identified through reports - Counts are locked when all identified issues are resolved. Can only be unlocked by EM. - EMS system validation and reconciliation checks.		PL: Checklists that process is complete PEM: Checklists that process is complete
		Accurate	- All cast votes are counted and allocated to correct voting place, candidate or party - EMS calculates the combined results correctly - All records are accurately recorded	Issues management dashboard shows high no. unresolved issues on Friday E+13	Spot checks: - Check that automatically resolved duplicate results sets are correct. Completes Official results checklist: - Includes sign-off that all quality checks are complete.		Spot checks: Sight paper-trail of results issues that have been resolved in the issues management screen	Follow official count process
		Timely	Results are released within legislative/agreed timeframes	Dashboard monitoring shows a delay in results finalisation (e.g. completion				

Activity	Objective	Risk focus	What we expect to see	Early Warning Signs/Triggers	Voting Services (Domestic and CPT)	Ops R&A	Regional Advisors	Process controls (HQ and CPT staff)
				of counting and/or reasonableness checks) • Timeframes set out in the Operational Delivery Plan are going off-track				
		Security	• Access to documents and systems is restricted to only those who have an appropriate business need		Spot checks that security requirements are being followed at CPT.		Spot check that security requirements are being followed.	
Special votes processing		Validity	• All special votes are validated and qualified • Special votes are only included in the official count if: the vote was received on time with a correctly filled in Special vote declaration OR the voter is found on the electoral roll.	Ops R&A review shows issues with process compliance	Monitoring: •	Process compliance check in selected HQs and the CPT: • Process instructions followed • Use of boxes, separation of valid and invalid votes Systems controls checks: • OSApp – new qualification functionality is working as expected • EMS – new Party Vote qualification functionality is working as expected	Spot checks: • Votes have been correctly disallowed • Votes have been correctly qualified • Disallowed votes are captured on the master roll	
		Completeness	• All SVD's that are validated are included in the count	Dashboards show SV processing is behind.	Monitoring: • Progress of SV processing – completeness and timeframes			PL: Checklists that process is complete PEM: • Daily checklist that processes are complete to timeframes • ERSAs records - balances with manual count of NQ and DIS cases
		Accurate	• Validity decisions are correct	Heat map of disallowed votes shows variations beyond agreed thresholds			Spot checks: • Qualification stickers are correctly matched to declaration	
		Timely	• Processed within the required timeframes		Monitoring: • Progress of SV processing – completeness and timeframes			
		Security	• Access to documents and systems is restricted to only those who have an appropriate business need		Spot checks that security requirements are being followed at CPT.		Spot check that security requirements are being followed.	
Dual votes and Post-Writ changes	Only valid votes are included in the official count	Validity	• All apparent dual votes have been investigated and there is an audit trail of all apparent dual votes. • All dual votes (DV) are removed from counts as per dual votes legislation- Act s176 (2)-(8) • All votes from voters who transferred electorates after Writ Day are identified and excluded from the wrong electorate's count	Dashboard monitoring shows a high number of DV and PWC cases still to be resolved.	Monitors: • Dual votes in electorate reports that may be merged/overwritten electors	Process compliance check in selected HQs and the CPT: • Investigations follow standards set out in instructions • Correct documentation used (M71-INVEST, investigation script, etc.)	Spot checks: • Extracted votes are correctly removed from the physical count and the results data in EMS • Data is correctly updated in ERSAs.	
		Completeness	• All dual votes have been investigated, all extractions have been completed.		Monitors: • All Apparent Dual Votes are resolved • All Post-Writ changes are processed			PL and PEM: • Complete daily checklists, confirming that process is complete
		Accurate	• The investigation leads to an accurate outcome	• No dual votes are identified in FINAL report • All cases are resolved as OMR/clerical errors	Monitors: • No. of DVs captured in Final Dual Votes report • No. of DVs resolved within the different decision categories		Spot checks: • Correct decisions reached based on information captured. • The correct ballot paper has been removed for identified DVs and PWCs	Dual Votes Process Leader: • Completes daily checklist focused on completion of process steps PEM: • Completes daily checklist focused on timeframes
		Timely	• All investigations are completed by Extraction Day	Timeframes set out in the Operational Delivery Plan are going off-track	Monitors: • DVs are resolved and PWCs processed by agreed timeframe			
		Security	• Investigation and associated documentation is restricted.		Spot checks that security requirements are being followed at CPT.		Spot check that security requirements are being followed.	

Activity	Objective	Risk focus	What we expect to see	Early Warning Signs/Triggers	Voting Services (Domestic and CPT)	Ops R&A	Regional Advisors	Process controls (HQ and CPT staff)
Certification / Prepare the final results		Validity	Correct removal is recorded and reflected in ERSAs	Heat map of disallowed votes shows variations beyond agreed thresholds	Complete checklist confirming all post-election processes are complete	Process check for selected HQs and the CPT: - Final checks are completed according to established process. CPT checks: - Partial certificates are signed and forwarded to EMs according to instructions and timeframes.	Spot check: Final certificates are completed at the appropriate time	
		Completeness	All required data is collected, all documentation is complete and signed by required parties	Data has changed since the certificate was signed by the EM and JP	Monitors: - Completion of Final results certificates - Upload of the Final results certificates into EMS			PEM: Completes daily checklist that all processes are complete. EM: Completes final certification checklist.
		Accurate	All electorates' final certificates match results in EMS		Complete Final results checklist: - Check Final certificates match information in EMS - Check disallowed vote data via heat map across electorates			
		Timely		Timeframes set out in the Operational Delivery Plan are going off-track				
		Security	We can demonstrate that results haven't been inappropriately changed We can demonstrate that results have been checked					
Announce the results / Media release	Transparency of the results	Validity	Meets formatting requirements Meets statistical requirements			Process checks: - Agreed processes and templates are used to deliver the official results - Required sign-offs are obtained - Agreed timeframes are met		
		Completeness	All required documentation and data is released					
		Accurate	Data is reliable: MP and party names, winning candidates, electorate and party results, and turnout figures are correct.		Complete Official Results Media Release checklist, alongside Manager D&I, Comms Team			
		Timely	Announcements are made within the required timeframes.	Timeframes set out in the Operational Delivery Plan are going off-track				
		Security	Results are not able to be accessed until released					