

20 March 2025

By email to: [REDACTED]

Dear [REDACTED]

OFFICIAL INFORMATION ACT REQUEST 2025/06

On Thursday 20 February 2025 you made a request under the Official Information Act 1982 (the OIA) for the following information:

What actions has the Electoral Commission taken in response to eRoll issues in the 2023 election, following these recommendations from the board:

- *a review of the current software development lifecycle to ensure appropriate checks and controls are in place to capture all functional and non-functional requirements, to be completed by end of Q1 2024;*
- *a review of how load testing of key business applications is delivered in future, including the use of external third party specialist providers to be completed by the end of Q2 2024;*
- *a review of performance monitoring that is in place across Electoral Commission IT systems including monitoring by our third party providers, to be completed by the end of Q1 2024; and*
- *further embedding of the major IT incident management process introduced by the Electoral Commission and Catalyst during Q1 2024.*

Separately, RNZ would like to OIA all internal communications (including IT staff feedback to consultation around proposed role changes from October last year) that report concern that there would not currently be able to run an election or byelection because of a lack of IT staff.

As clarified and agreed with you, we have included communications with the Chief Information Officer, Deputy Chief Executive Enterprise Services and Chief Electoral Officer.

The Commission has taken the following actions regarding these recommendations from the Commission's Board to ensure that eRoll is effective for future events.

- An external review into the Commission's software testing capabilities was undertaken in Q1 2024. This review included consideration of how the Commission captured functional and non-functional requirements, and their impact on software testing. Following this review, a role of Test & Release Manager was established within the IT team and this role will lead on further improvements in this area.
- The review into the Commission's software testing capabilities also included scope to consider how load testing of key business applications was undertaken. It recommended

that the Commission utilise an independent 3rd party for performance testing, and this is being considered as part of the test planning for the 2026 General Election.

- 3rd party providers contracted by the Commission have an obligation to undertake performance monitoring across our IT systems. The effectiveness of the Commission's management of these contractual obligations was included within a broader review of the Commission's contract management capabilities undertaken by Deloitte. The Deloitte report on the Commission's contract management and 3rd party risk management processes is still under active development and refinement. The draft report is withheld under section 9(2)(g)(i) of the OIA on the ground that the withholding of the information is necessary to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any public service agency or organisation in the course of their duty. I am satisfied that the reasons for withholding of the information are not outweighed by other considerations which render it desirable, in the public interest, to make that information available.
- In 2023, the Chief Information Officer undertook work to embed the IT Incident Management processes. As part of recent changes, a position of IT Operations Lead was established that has accountabilities for IT incident management processes and capabilities. We also have a Principal Advisor, Enterprise Services that has responsibility for Business Continuity Management across the Commission. They were on parental leave for the first half of 2024, and on their return have been actively working with each team regarding their incident management processes.

The changes to the Commission's IT department in 2024 were undertaken to establish an organisational design for a high performance, highly capable, modern IT team that supports the Commission to meet its strategic objectives now and in the future. The Commission's technology needs continue to form a critical part of delivering its core functions, and the existing team structure and position descriptions were no longer fit for purpose.

You have asked specifically for any feedback that reports concern that we would not currently be able to run an election or by-election because of a lack of IT staff. There was a range of feedback including some positive feedback around the change and the purposes of the change outlined above. Of the 31 pieces of written feedback we received from our staff as part of the consultation regarding proposed role changes in our IT department, 1 individual submitter raised this risk.

The submission is withheld under section 9(2)(ba) of the OIA to protect information which is subject to an obligation of confidence where the making available of the information would be likely to prejudice the supply of similar information, or information from the same source, and it is in the public interest that such information should continue to be supplied; or would be likely otherwise to damage the public interest. A summary of the concern raised is provided below.

In each case where redactions have been made under section 9(2)(a), or information has been withheld under section 9(2)(ba), consideration has been given to and I am satisfied that the reasons for withholding of the information are not outweighed by other considerations which render it desirable in the public interest to make that information available.

The paper 'ELT Cover Paper - IT Decision 191124' was presented to the Executive Leadership Team on the 19th of November 2024 and included a summary of the feedback received during the change process. The relevant content and minutes from this paper has been included below.

"24. Their feedback highlighted that this would encourage kaimahi to leave the organisation and this would realise known single point of failure risks and impact the Commission's ability to undertake election events."

Minutes

"Key person risk for delivering GE26 IT services is being monitored closely as plans are developed and implemented. Catalyst's third-party services are a mitigating factor partially addressing election delivery risk in the event that key staff depart, but are not a full mitigation."

We're making good progress on recruitment, and with the support of our critical suppliers, we are confident of the Commission's ability to run a by-election or election.

In the interests of transparency, we release responses to Official Information Act requests every 3 months. We will publish this response with your personal details redacted.

You have the right under section 28(3) of the Act to make a complaint to the Ombudsman if you are not satisfied with the response to your request. Information about how to do this is available at www.ombudsman.parliament.nz or by phoning 0800 802 602.

Yours sincerely



Lucy Hickman
Deputy Chief Executive, Enterprise Services