



## Electoral Commissioner

Our Ref: 13/997

The Hon Mr Tony Smith MP  
Chair  
Joint Standing Committee on Electoral Matters  
PO Box 6021  
PARLIAMENT HOUSE ACT 2600

Dear Mr Smith

### **Inquiry into the 2013 federal election - public hearing of 12 March 2014**

This submission provides the Australian Electoral Commission's response to a number of requests for information taken on notice at the Joint Standing Committee on Electoral Matters' (JSCEM) public hearing held in Canberra on 12 March 2014.

The AEC's response to the Chair's request for information about barriers to implementing electronic certified lists will follow in early course.

#### **1. Griffith by-election evaluation report**

1.1 At page seven of the transcript, Senator Faulkner requested copies of the AEC Griffith by-election evaluation report to be provided to the committee.

##### *AEC Response*

1.2 The Griffith by-election evaluation report is provided at **Attachment A**.

#### **2. Previous experience of 2013 federal election temporary staff**

2.1 At page 15 of the transcript, Mr Griffin requested a break down by role, of temporary staff at the 2013 federal election with previous election experience.

**Mr GRIFFIN:** [Middle-range temporary staff] should be people who are experienced, which therefore means the cultural issues and the nature of the training is incredibly important. However, at the lowest level the circumstances are that, frankly, they are basic tasks with limited training required and are being supervised. I am interested to know what level of inexperience we are dealing with at what level.

*AEC Response*

2.2 Break down by role of temporary staff experience at the 2013 federal election was:

| <b>Role</b>  | <b>Previous election experience (%)</b> | <b>No previous election experience (%)</b> |
|--|---|--|
| Declaration Vote Issuing Officer                   | 64.86                                   | 35.14                                      |
| Electoral Visitor                                  | 63.80                                   | 36.20                                      |
| Electoral Visitor in Charge                        | 87.99                                   | 12.01                                      |
| Inquiry Officer                                    | 56.13                                   | 43.87                                      |
| Issuing Officer Interstate Voting Centre           | 52.17                                   | 47.83                                      |
| Issuing Officer PPVC (Pre-election day)            | 63.99                                   | 36.01                                      |
| OIC 11+ issuing points                             | 94.13                                   | 5.87                                       |
| OIC 7-10 issuing points                            | 92.99                                   | 7.01                                       |
| OIC 4-6 issuing points                             | 89.59                                   | 10.41                                      |
| OIC 1-3 issuing points                             | 84.76                                   | 15.24                                      |
| OIC Interstate Voting Centre                       | 81.53                                   | 18.47                                      |
| OIC PPVC (Pre-Election day)                        | 89.17                                   | 10.83                                      |
| Part Day Polling Assistant (5 hrs as directed)     | 16.65                                   | 83.35                                      |
| Part Day Polling Assistant (8 hrs as directed)     | 33.33                                   | 66.67                                      |
| Polling Assistant (includes counting after 6.00pm) | 40.88                                   | 59.12                                      |
| Polling Place Liaison Officer                      | 95.70                                   | 4.30                                       |
| PPVC Scrutiny                                      | 15.14                                   | 84.86                                      |
| Pre Poll 2IC                                       | 81.38                                   | 18.62                                      |
| Remote Area Mobile Polling Assistant               | 0.00                                    | 100.00                                     |

|                                     |       |       |
|-------------------------------------|-------|-------|
| Remote Mobile Assistant Team Leader | 90.91 | 9.09  |
| Remote Mobile Team Leader           | 69.77 | 30.23 |
| Remote Mobile Team Member           | 47.06 | 52.94 |
| Scrutiny Assistant                  | 10.12 | 89.88 |
| Second in Charge                    | 84.35 | 15.65 |
| Temporary Assistant Level 1         | 44.05 | 55.95 |
| Temporary Assistant Level 2         | 89.58 | 10.42 |
| Trainer Polling Staff (TOPS)        | 87.69 | 12.31 |
| Voter Information Officer           | 18.81 | 81.19 |

2.3 The data is derived from records of employment and shows temporary employees from the 2013 federal elections that have worked for the AEC previously.

### 3. Other

3.1 Mr Rogers undertook to provide JSCEM with a copy of our training evaluation as per page 29 of the 6 February 2014 transcript. This document will be provided once the evaluation is complete.

Yours sincerely

Kevin Kitson  
Acting Deputy Electoral Commissioner

4 April 2014

# Keelty Implementation Team

## Evaluation of implementation of interim measures for relevant recommendations for the Griffith by-election

2 April 2014

# Keelty Implementation Team

Evaluation of implementation of interim measures for relevant recommendations for the Griffith by-election

2 April 2014

# Contents

|   |          |
|---|----------|
| <b>1. Background .....</b>  | <b>3</b> |
| <b>2. Purpose, objective and scope .....</b>  | <b>3</b> |
| <b>3. Methodology .....</b>   | <b>4</b> |
| <b>4. Implementation evaluation .....</b>   | <b>5</b> |
| 4.1 Guidelines, Standards and Directions .....  | 5        |
| 4.1.1 Ballot Paper Principles .....   | 5        |
| 4.1.2 Ballot secure zone guidance .....   | 5        |
| 4.1.3 Rubbish and Recycling Disposal Processing Guide .....   | 6        |
| 4.1.4 Minimum Standards and Operational Guidelines for Out-posted Centres ..                          | 8        |
| 4.1.5 Improved rigour relating to use of visitor's registers at all AEC sites.....                    | 8        |
| 4.1.6 Restricted access to local print ballot paper file.....   | 9        |
| 4.1.7 Regular AEC system scans to ensure ballot paper images were not saved<br>on network drives..... | 11       |
| 4.1.8 Review of all contracts relating to the Griffith by-election .....                              | 12       |
| 4.1.9 TOLL reverse logistics for return of envelopes from other AEC offices.....                      | 13       |
| 4.2 Secure labels and seals .....   | 16       |
| 4.2.1 Tamper evident labels.....  | 16       |
| 4.2.2 Clean waste and Food/household waste labels .....   | 17       |
| 4.2.3 Sealable containers to dispatch/return ballot papers from polling places..                      | 18       |
| 4.3 Forms for AEC staff .....   | 20       |
| 4.3.1 Record of Rubbish/Recycling Disposed Form .....   | 20       |
| 4.3.2 Ballot Paper Despatch: Printer to AEC Location Manifest .....                                   | 20       |
| 4.3.3 Polling Place Ballot Paper Tracking Form .....  | 22       |
| 4.3.4 Declaration Count Ballot Paper Tracking Form .....  | 23       |
| 4.3.5 Daily Exchange of Ballot Papers Form.....   | 25       |
| 4.3.6 Ballot Paper Transport Exception Form .....   | 26       |
| 4.3.7 Ballot Paper Security Direction and Acknowledgement.....  | 27       |
| 4.3.8 Record of Ballot Box Contents Form .....  | 28       |

|           |   |           |
|-----------|---|-----------|
| 4.4       | Staff and training.....   | 30        |
| 4.4.1     | Additional ballot paper security slides for Training of Polling Staff.....                                  | 30        |
| 4.4.2     | Election Procedures Handbook addendum .....   | 31        |
| 4.4.3     | Email to Griffith polling staff .....   | 32        |
| 4.4.4     | Visual identification for all AEC staff at polling places .....   | 33        |
| 4.4.5     | Divisional Materials Manager & Divisional Materials Manager Log.....  | 34        |
| 4.4.6     | Allocating Ballot Box Guards to all polling places .....  | 35        |
| 4.4.7     | Allocating Polling Place Liaison Officer assistants.....  | 36        |
| <b>5.</b> | <b>Conclusion .....</b>   | <b>39</b> |
|           | <b>Appendix A: Keelty Recommendations Advanced at the Griffith by-election. ....</b>                        | <b>40</b> |
|           | <b>Appendix B: Reference Table of Keelty Recommendations Advanced at the Griffith<br/>by-election .....</b> | <b>41</b> |

# 1. Background

On 31 October 2013 the Electoral Commissioner announced that 1 375 Senate ballot papers (later confirmed as 1 370) could not be found for the purposes of the 2013 Western Australia Senate recount. Mr Mick Keelty AO was formally appointed on 5 November 2013 to undertake an investigation into the circumstances which led to the loss of the ballot papers. Mr Keelty provided his report *Inquiry into the 2013 WA Senate Election* (the Keelty Report) on 2 December 2013.

The report outlined significant failures in some of the processes and procedures for the handling, movement and storage of Western Australian (WA) Senate ballot papers and made 32 recommendations. All of Mr Keelty's recommendations were accepted by the full three-person Australian Electoral Commission.

In December 2013, a dedicated task force was established to oversee the implementation of Mr Keelty's recommendations. The task force is made up of two groups:

- The Keelty Implementation Reference Group (KIRG) to oversee the implementation program; and
- The Keelty Implementation Team (KIT) as a smaller team to lead implementation tasks.

The task force was established with the then Deputy Electoral Commissioner as Chairperson and a First Assistant Commissioner as Deputy Chairperson. From 24 February 2014 the First Assistant Commissioner assumed the role of Chairperson of the task force.

In addition to the work of KIRG and KIT, other relevant business areas in the AEC have been involved in enhancing procedures and products in order to facilitate implementation of the Keelty recommendations.

Within a month of the formation of KIRG, on 6 January 2014, the Speaker of the House of Representatives issued a writ for the Griffith by-election to be held on 8 February 2014. The AEC prioritised implementation of practical measures that would enhance processes and procedures relating to ballot paper security for the purposes of the Griffith by-election.

## 2. Purpose, objective and scope

The purpose of this report is to evaluate the implementation of measures and activities intended to give effect to selected recommendations from the Keelty Report.

The objective of this report is to evaluate the 27 measures and activities implemented for the purposes of the Griffith by-election for their effectiveness in addressing the relevant



recommendations and assess their suitability for application at future electoral events. The objective is expressly not to evaluate the measures and activities to demonstrate complete and final implementation of each recommendation for closure.

The AEC anticipates a series of trials of particular measures and activities to ensure that the final suites of measures in response to all recommendations are effective and appropriate for successive general elections.

The scope of this particular evaluation is limited to the recommendations from the Keelty Report that were of direct relevance or consequence to the conduct of the House of Representatives by-election in the Division of Griffith. Of the 32 Keelty recommendations, five were deemed not applicable to the conduct of the Griffith by-election. The remaining 27 Keelty recommendations were advanced in some way by the 27 measures implemented; and by way of conducting this evaluation. Appendix A lists each Keelty recommendation and identifies which measures relate to it; furthermore, it identifies the five Keelty recommendations that were deemed to be extraneous to the conduct of a House of Representatives by-election.

### 3. Methodology

Implementation of the recommendations commenced immediately following acceptance of Mr Keelty's report by the AEC. KIRG and KIT worked diligently and expeditiously to operationalise the concepts articulated by the recommendations. Subsequently, a range of measures was in place for the Griffith by-election. Broadly, these operational measures relate directly to the handling, movement and storage of ballot papers and fall into the following three groups:

- The Folio of Interim Measures for the Griffith By-Election: Forms for Polling Officials;
- The Folio of Interim Measures for the Griffith By-Election: Policy and guidance for Polling Officials; and
- Other Keelty-related initiatives. Developed by AEC business areas outside KIT, but in consultation with the group.

For each measure within these groups the evaluation will consider:

- How did the measure seek to assist meeting or addressing the recommendation?
- Was it successful?
- How may it be improved?
- Is it scalable for future electoral events?
- Initial conclusion.

Evaluation of each measure or initiative in this report has been undertaken by the primary developer in consultation with key stakeholders as applicable (contributor names are listed in the table at Appendix 2).

## 4. Implementation evaluation

### 4.1 Guidelines, Standards and Directions

#### 4.1.1 Ballot Paper Principles

The Acting Electoral Commissioner sent an email to all AEC staff containing a ballot paper principles poster and explanatory text outlining the implications for the agency of the Keely Report on 20th January 2014.

##### How did the measure seek to assist meeting or addressing the recommendation?

- Developing and disseminating the ballot paper principles to all permanent AEC staff advances recommendations 9, 12 and 25 by:
  - Instituting a culture of security in ballot handling;
  - Introducing processes for the handling of ballot papers ‘from cradle to grave’; and
  - Adopting a ‘ballot paper doctrine’ that emphasises the security and sanctity of ballot papers and underpins all aspects of the AEC’s election operations.

##### Was it successful?

- The poster is on display in all AEC offices and in out-posted centres such as the fresh scrutiny centre in use for the Griffith by-election.
- It effectively communicates the ballot paper doctrine to which the AEC adheres.

##### How may it be improved?

- Broader circulation of the ballot paper principles, via display on AEC computer desktops, in signature block branding, embedded in training material etc. would further the effectiveness of this measure

##### Is it scalable for future electoral events?

- Dissemination of the Ballot Paper Principles to all permanent and temporary AEC staff is scalable for future electoral events.

##### Initial conclusion

- KIT recommends further promotion and adherence to the Ballot Paper Principles as a measure central to implementation of a number of Keely recommendations.

#### 4.1.2 Ballot secure zone guidance

A guidance document was developed to provide staff with information and guidance around the implementation of ballot paper secure zones for the Griffith by-election.

How did the measure seek to assist meeting or addressing the recommendation?

- The ballot secure zone guidance advances recommendations 4, 10, 11 and 21 by:
  - Acknowledging that not all individuals are 'logistics professionals' and introducing this control relating to the movement of ballot papers;
  - Instituting a concept of 'ballot secure zones' at all premises where ballot papers are handled or stored;
  - Ensuring ballot secure zones are cleared before the arrival of ballot papers and that they remain secure and 'sterile' at all times when ballots are present; and
  - Ensuring instructions and planning documents are sufficiently detailed.

Was it successful?

- For the Griffith by-election ballot paper secure zones were implemented across the Division in a considered and controlled manner in polling places and other premises where ballot papers were handled and stored. This included pre-poll voting centres, mobile polling, return of materials and the scrutiny centre.
- There was clear instruction to staff about access to the ballot paper zones and the conduct expected of them.
- Clear signage of the ballot paper secure zones was implemented.

How may it be improved?

- Some additional guidance to OICs would be advantageous; including detail around ballot paper secure zones at the polling place and at private premises prior to polling day and the provision of posters.

Is it scalable for future electoral events?

- Ballot paper secure zones are scalable for future electoral events.

Initial conclusion

KIT recommends adoption of ballot paper secure zones as a measure central to implementation of a number of Keelty recommendations.

### 4.1.3 Rubbish and Recycling Disposal Processing Guide

The rubbish and recycling processing guide provides instructions for the establishment of segregated and labelled rubbish bins and holding bays; necessitates written authorisation of all rubbish and recycling disposal; and instructs staff to retain clean waste until the completion of the election.

How did the measure seek to assist meeting or addressing the recommendation?

- The establishment and dissemination of the Rubbish and Recycling Disposal Processing Guide advances recommendations 2, 5 and 21 by:

- Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence; in this case, the segregation of materials for disposal;
- Introducing a process for disposal of recycling and rubbish which ensures that no ballot material is inadvertently lost or destroyed; and
- Ensuring instructions and planning documents are sufficiently detailed.

#### Was it successful?

- The guide was successfully implemented at the Griffith by-election. Staff utilised the bins and attached labels and sought DRO authorisation as instructed before disposing of rubbish.
- Polling places that returned rubbish were processed correctly in accordance with the guide.
- Once staff were familiar with the process it was not onerous to dispose of rubbish in accordance with the guide.

#### How may it be improved?

- Based on observations of bin usage in the out-posted centre in Griffith, the processing guide may need to be adjusted slightly to focus on bin placement (so that no food/household waste bins are in areas where ballot papers are stored).
- Staff and scrutineer briefings outlining the arrangements for rubbish and recycling disposal were developed to meet a need identified at the Griffith by-election. These were delivered by the DRO and relevant supervisors and were understood by the audience. These will be integrated into the process guide as appendices for future electoral events. Posters for display will also be included in the document. Operational training for Divisional staff on the new process will be essential for future electoral events.
- Coloured bags (to further differentiate between clean and food/household waste) were not able to be secured for the Griffith event but are being sought going forward.
- For future events, cardboard should also be retained and require authorisation for eventual disposal in the same manner as clean waste.
- There is also a need to extend the process more rigorously to other AEC premises, particularly National, State and Divisional Offices.

#### Is it scalable for future electoral events?

- The guide is scalable to other events and is essential for future events

#### Initial conclusion

KIT recommends adoption of the Rubbish and Recycling Processing Guide as a measure central to implementation of a number of Keelty recommendations

#### 4.1.4 Minimum Standards and Operational Guidelines for Out-posted Centres

The out-posted scrutiny centre for the Griffith by-election was secured prior to KIT's establishment of the Minimum Standard and Operational Guidelines for Out-posted Centres. These standards and guidelines include reference to security, egress, accessibility and exclusive use by the AEC.

##### How did the measure seek to assist meeting or addressing the recommendation?

- Establishing Minimum Standards and Operational Guidelines for Out-posted Centres advances recommendations 20 and 21 by:
  - Revising guidelines regarding the suitability of premises; and
  - Ensuring instructions and planning documents are sufficiently detailed.

##### Was it successful?

- Minimum standards outlined by KIT were met for the Griffith by-election.

##### How may it be improved?

- Further review of the applicability and reasonableness of the standards should be undertaken after future electoral events.

##### Is it scalable for future electoral events?

- The AEC makes every endeavour to obtain ideal premises for the conduct of an electoral event. However, the AEC is subject to the variables of local property markets across the country.

##### Initial conclusion

- KIT recommends maintaining the current Minimum Standard and Operational Guidelines for Out-posted Centres for future electoral events.

#### 4.1.5 Improved rigour relating to use of visitor's registers at all AEC sites

The AEC Visitor Access, Implementation and Usage Policy is in line with the Protective Security Policy Framework PHYSEC-5 where visitor registers are operational at all AEC offices. The message was reinforced in January 2014.

##### How did the measure seek to assist meeting or addressing the recommendation?

- Improved rigour relating to the use of visitor registers advances recommendations 9 to 13, 19 and 20 by:
  - Instituting a culture of security in ballot handling;
  - Instituting a concept of 'ballot secure zones' at all premises where ballot papers are handled or stored;
  - Ensuring ballot secure zones are cleared before the arrival of ballot papers and that they remain secure and 'sterile' at all times when ballots are present;

- Introducing processes for the handling of ballot papers ‘from cradle to grave’;
- Using tamper evident material for the transfer and storage of ballot papers;
- Developing and applying improvements to national and state warehousing management practices; and
- revising guidelines regarding the suitability of premises.

#### Was it successful?

- This is a valuable tool to ensure only authorised persons have access to AEC offices.

#### How may it be improved?

- The visitors register is a live document, subject to ongoing review and monitoring. Improvements are possible, particularly with respect to protecting personal information. Compliance measures may also be needed to ensure proper use in all offices

#### Is it scalable for future electoral events?

- This measure is scalable for future electoral events.

#### Initial conclusion

- KIT recommends continuing the use of visitor registers for future electoral events.

### 4.1.6 Restricted access to local print ballot paper file

A restricted SharePoint site was introduced containing the PDF file of the Griffith ballot paper for Divisional Offices around Australia to print stock for pre-poll declaration votes. The SharePoint site was locked to the user profile of the nominated AEC staff member in each relevant location and the ballot paper file was only available after a password was entered by the staff member. Complementing this measure, the AEC instituted regular AEC system scans to ensure that ballot paper images were not being saved to computer network drives and is evaluated as a separate measure at 4.1.7.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Restricted access to local print ballot paper files advances recommendations 2, 4, 9, 12, 14 and 15 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper’s existence by being able to record transfer of ballot papers at all times under AEC control;
  - Acknowledging that not all individuals are ‘logistics professionals’ and introducing this control relating to the movement of ballot papers;
  - Instituting a culture of security in ballot handling;

- Introducing processes for the handling of ballot papers ‘from cradle to grave’;
- Specifying and defining the role of employees at every stage of the ballot handling process; and
- Providing written instructions to individuals in specified roles

#### Was it successful?

- The site restriction was controlled according to access requirements identified by Operations Management staff in states and all access (other than administrator access) was removed at close of pre-poll (WA time) on 7 February.
- The site tracks how many times a unique user accessed the site’s URL addresses and recorded the number of unique visitors per day, allowing access analytics to be performed.
- The site restriction appears to have limited access to ballot paper PDFs and site analytics do not highlight any abnormal access by any relevant staff.
- There were a high number of “access denied” hits on the site (181). This was likely due to people attempting to access the page before access was granted.
- The number of accesses per staff member (between 2 and 5) are appropriate for access to print the required stock.

#### How may it be improved?

- The restrictions on SharePoint mechanics allow restriction to the site and password protection of access to the PDF image, however there is no “restriction” as such on how many times the paper can be printed once access is obtained.
- AEC systems can be interrogated to check how often the file has been sent to a multi-function device for printing, but this requires a somewhat lengthy IT security request.
- There is also currently no way to ensure that a staff member has not sent the print file to a different printer (as only multi-function devices are file traceable to a person’s profile), or have photocopied a ballot paper file print.

#### Is it scalable for future electoral events?

- Scalability for future electoral events is simple, as a similar access mechanism could be established for relevant staff (noting that, for Senate ballot papers, access would only be to A4 emergency stock, as divisional office DO printers can’t produce Senate ballot paper size stock).
- As this should only be a mechanism required under limited circumstances, access could be granted, but the password provided only on a needs-basis (staff call to get access).
- General federal elections could be facilitated, but more thought would need to be given to how all House of Representatives PDFs would be displayed/accessed,



and whether a restriction to only one relevant staff member would work, given the mobility of electors and staff for a full event.

- The maintenance of the access in the current SharePoint site form is a little onerous and can only be managed manually (i.e. there is no way to set dates for access to be granted or removed, or profiles shifted, without administrator activity).

#### Initial conclusion

- KIT recommends continuing the use of the restricted SharePoint for future electoral events where ballot papers have to be made available for local printing, noting that while it was a suitable solution for the Griffith by-election, the solution could be enhanced.

#### 4.1.7 Regular AEC system scans to ensure ballot paper images were not saved on network drives

IT Branch (ITB) conducted AEC system scans of network drives searching for ballot paper file and reviewed multi-function device print logs as a complementary measure to enhance the effectiveness of restricting access to local print ballot paper file to authorised AEC officers as discussed at 4.1.6.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Regular AEC system scans to ensure ballot paper images are not being stored on network drives advances recommendations 4 and 17 by:
  - Acknowledging that not all individuals are 'logistics professionals' and introducing this control relating to the movement of ballot papers; and
  - Introducing a system of proactive audits to determine compliance.

#### Was it successful?

- AEC system scans of network drives and the creation of the locked ballot paper page were a solution to a quick request within limited timeframes.
- For the Griffith by-election these actions were able to support the needs of KIT's requirements.
- Multi-function device logs can be generated as requested.

#### How may it be improved?

- The need to scan AEC network drives can be removed by designing and implementing a page that can dynamically create the ballot paper content for specific users.
- This type of solution can remove the ability to save to a network drive or save the content.
- Greater control on saving and printing can be provided as ITB was unable in the short period of time to lock down the browser.



#### Is it scalable for future electoral events?

- ITB is looking at what would be the effort/cost to implement a more scalable solution for future electoral events.
- ITB recommends the continuation of the modernisation of the printer fleet with an on-going focus on security measures.

#### Initial conclusion

KIT recommends an alternative solution be implemented to achieve the same outcome, noting that while it was a suitable solution for the Griffith by-election, there are more effective solutions for future events; e.g. removing the ability to save the content or documents by providing a page that dynamically creates a specific ballot paper would negate the need to scan for saved files.

#### **4.1.8 Review of all contracts relating to the Griffith by-election**

A review of all contracts relating to the Griffith by-election was undertaken.

#### How did the measure seek to assist meeting or addressing the recommendation?

- The review of all contracts relating to the Griffith by-election advanced recommendations 6, 7 and 27 by:
  - Ensuring staff have develop skills in contract management and enforcement;
  - Conducting quality assurance to ensure contract suppliers are meeting their obligations; and
  - The AEC assuring itself, to the best of its ability, of the political neutrality of all persons handling ballot papers.

#### Was it successful?

- The Review was successful in identifying: the end dates for relevant contracts, ensuring the AEC could access required goods/services; whether political neutrality clauses were included; and contractual security requirements, particularly with respect to contracts impacting on ballot papers.
- As an outcome of the review, where appropriate suppliers were notified of the AEC's political neutrality requirements and Deeds of Confidentiality and Political Neutrality were requested. While a Review of this nature can support contract managers and potentially mitigate contractual issues identified, the enforcement of the contract provisions relies on contract managers at an operational level
- The contract reviews for the Griffith by-election identified general security requirements contained in contracts that need to be actively managed. For example, the reviews highlighted provisions relating to the movement of AEC Material and Contract Material in ballot paper printing contracts.

- Pursuant to the review a notice to contract cleaners requiring them to sign a deed of confidentiality including political neutrality and notifying them that access may be restricted on a local level.

#### How may it be improved?

- Similar contract review processes would be significantly improved by the use of the Procurement and Contract Management Register (the Register). The Register became mandatory from 20 January 2014. AEC Officials are required to enter all current contracts
- Future reviews of this nature could be automatically generated based on information that has been entered into the Register. However, this process relies on contract managers accurately entering all contract information into the Register in a timely manner.
- To improve future reviews of election related contracts, the AEC's Legal Services Branch will: continue to work with contract managers to ensure all agreements are accurately entered into the register; liaise with Elections Branch to ensure the register identifies all election related contracts; work with IT Solutions to continually improve the register, including the reporting function; and provide face-to-face training to AEC Officials on procurement, contract management and use of the register.
- In addition to effective contract management, the AEC may benefit from developing consistent security requirements for certain contracts, such as ballot paper printing contracts. This would contribute to the implementation of recommendation 9.

#### Is it scalable for future electoral events?

- This measure is scalable for future electoral events.

#### Initial conclusion

- KIT recommends ongoing review of all election-related contracts for future electoral events.

### 4.1.9 TOLL reverse logistics for return of envelopes from other AEC offices

TOLL Online was utilised for the return of pre poll envelopes from offices around Australia.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Use of TOLL Online for the return of pre-poll envelopes advances recommendations 2, 4 and 8 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence by being able to record transfer of ballot papers at all times under AEC control;

- Acknowledging that not all individuals are 'logistics professionals' and introducing this control relating to the movement of ballot papers;
- Engaging with logistics professionals to conduct market research pursuant to utilising industry best practice standards.

#### Was it successful?

- The TOLL Online process was successful overall with 90% of envelopes collected on time and 86.4% delivered on time.
- TOLL was prompt and proactive in following up the late collections and used any and all methods to ensure delivery was made as soon as possible after the missed deadline.

#### How may it be improved?

- There is scope for improvement in the processes. Basic statistics are as follows:
  - Collection:
    - 90% collected on time (80 envelopes);
    - 9% collected 1 day later (8 envelopes); and
    - 1% collected 2 days later (1 envelope).
  - Delivery:
    - 86.5% delivered on time (77 envelopes);
    - 10% delivered 1 day later (9 envelopes); and
    - 3.4% delivered 2 days later (3 envelopes).
- At a debrief with TOLL on 17 March 2014 issues that delayed envelopes and how best to mitigate them in the future were discussed. Most of the issues were out of the AEC's control and are a matter for discussion between TOLL and their sub-contractors.
- Some of the system workings need to be clarified by TOLL e.g., a collection date of 10 February was input for two Divisions but for reasons unknown it changed in the system to 11 February.
- An understanding of each other's language also caused some issues e.g. TOLL utilise towns and cities as identifiers whereas the AEC uses Divisions.
- Awareness of these things and training for all staff in the processes, a procedure document with a checklist (of things to look for that could prevent issues from occurring) is required and samples of the various paperwork so staff know what to expect when the Toll courier arrives etc. e.g. a manifest was marked as Off Peak instead of Overnight which was an input error. Had the despatching Division read the manifest before signing, they would have seen that the collection was marked Off- Peak and the error could have been corrected at that stage.
- For the Griffith by-election, data input could be done by divisions (which would solve the 'time prediction' issue) with monitoring and follow up done centrally by

the QLD state office support team (SOST) given the management of the Toll contract comes under its remit.

Is it scalable for future electoral events?

- While the process could be possibly be used for any electoral event, further analysis would need to be undertaken to determine the feasibility for a general federal election given the number of variables. This includes the time pressures for staff in a full federal election environment and the difficulty staff have in predicting when items will be ready for collection (given that there are deadlines for collections to meet specific AEC timeframes i.e. Central Senate Scrutiny (CSS) deliveries etc.).
- From an administrative perspective, the system was easy to use and relatively straightforward to input the data and being able to use the Track and Trace was effective, as there was a point of reference when following up with Toll. This does of course rely on the information being promptly uploaded to the database by the courier on collection. There is also a cost consideration.

Initial conclusion

- KIT recommends exploring further tracking options for the exchange of declaration votes for future electoral events.

## 4.2 Secure labels and seals

### 4.2.1 Tamper evident labels

Tamper evident labels were created for use on packages containing ballot papers. The labels were designed to be fixed over the packaging tape so that if packaging tape was removed or cut the tamper evident label would also be damaged.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Use of tamper evident materials advances recommendations 2, 13 and 22 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence by being able to record transfer of ballot papers at all times under AEC control;
  - Using tamper evident material for the transfer and storage of ballot papers; and
  - Employing tamper-proof labelling that is able to be applied consistently.

#### Was it successful?

- Conceptually the in-house solution was successful, staff understood the use of the label and it was widely used as per the intent.

#### How may it be improved?

- The AEC investigated the possibility of having the seals professionally produced however they could not be produced within required timeframes. An in-house solution was implemented.
- There are improvements that can be made. The label used was an "off the shelf" office label, while the label was of good quality it was manufactured to be stuck to plastic or paper, and it struggled to maintain adhesion to cardboard. Generally this was not an issue for the Griffith by-election implementation as cardboard was not widely used. However for future electoral events, particularly in Senate elections where boxes are the preferred mode of outer packaging, the current label would not be as effective.
- The requirement to record the reason for breaking the seal must remain, but improved instruction on the labelling may be required.
- A long term solution would benefit from a professionally produced product.
- Development of a guidance document showing when and how to use tamper evident labels.

#### Is it scalable for future electoral events?

- The use of tamper evident labels is scalable for future electoral events.

### Initial conclusion

KIT recommends adoption of the tamper evident labels a measure central to implementation of a number of Keelty recommendations.

#### 4.2.2 Clean waste and Food/household waste labels

These brightly coloured labels are placed on sealed bags of rubbish which are in turn placed in the designated rubbish holding bay. They provide a visual identification of the contents of sealed rubbish bags. These labels work in conjunction with the disposal record discussed at paragraph 4.1.8 and the Rubbish and Recycling Processing Guide at paragraph 4.2.4.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Providing visual identification of the contents of sealed rubbish bags advances recommendations 2 and 5 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence; in this case, the segregation of materials for disposal; and
  - Introducing a process for disposal of recycling and rubbish which ensures that no ballot material is inadvertently lost or destroyed.

#### Was it successful?

- The Clean waste and Food/household waste labels were successfully utilised to authorise disposal of waste for the Griffith by-election .

#### How may it be improved?

- The use of coloured bin liners in future (to further assist in identification of bins) will make this more effective.
- Poster size labels have also been created for display in quarantined areas where sealed bin bags await disposal authority (this includes a yellow poster for cardboard recycling material to be retained for the duration of the election).
- Improvements have already been made to the labels in terms of wording and colouring following feedback from internal stakeholders.

#### Is it scalable for future electoral events?

- The Clean waste and Food/household waste labels are scalable for future electoral events.

### Initial conclusion

- KIT recommends adoption of the Clean waste and Food/household waste labels as measures central to implementation of a number of Keelty recommendations.

### 4.2.3 Sealable containers to dispatch/return ballot papers from polling places

The use of the moulded PVC ballot boxes to dispatch and return ballot papers from polling places was a stop-gap measure used for the by-election as Queensland AEC Offices had sufficient boxes available.

#### How did the measure seek to assist meeting or addressing the recommendation?

- The use of moulded PVC ballot boxes to dispatch and return ballot papers from polling places advances recommendations 2 to 4 and 9 to 13, 23 and 24 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence by being able to record transfer of ballot papers at all times under AEC control;
  - Introducing systems that minimise the movement of ballot papers;
  - Acknowledging that not all individuals are 'logistics professionals' and introducing this control relating to the movement of ballot papers;
  - Instituting a culture of security in ballot handling;
  - Instituting a concept of 'ballot secure zones' at all premises where ballot papers are handled or stored;
  - Ensuring ballot secure zones are cleared before the arrival of ballot papers and that they remain secure and 'sterile' at all times when ballots are present;
  - Introducing processes for the handling of ballot papers 'from cradle to grave';
  - Using tamper evident material for the transfer and storage of ballot papers;
  - Providing informed options for the review of packaging policies, particularly relating to the use of cardboard for transport; and
  - Providing options for the minimum standards for packing including integrity of boxes.

#### Was it successful?

- The use of the sealed ballot boxes received positive feedback from polling officials and demonstrated they understood the concept of a "secure zone" for ballot papers, even in their homes.
- The visual of unsealing the ballot box at the start of polling to distribute ballot papers gave an additional demonstration of change to all involved.
- The return of the ballot papers in the sealed box also gave another layer of visual security as they were sealed and the numbers recorded before leaving the polling place.

How may it be improved?

- The boxes themselves were too large to be used in future events and consideration should be given to an appropriately sized sealable container for the transport and storage of ballot papers.

Is it scalable for future electoral events?

- Senate ballot papers add another level of complexity but should not preclude using them for House of Representatives ballot papers.
- Consideration should also be given to including the completed declaration envelopes in similar containers for security.

Initial conclusion

- KIT recommends continuing the use of appropriately sized sealable containers or packaging for the transport and storage of ballot for future electoral events.



## 4.3 Forms for AEC staff

### 4.3.1 Record of Rubbish/Recycling Disposed Form

The Record of Rubbish/Recycling Disposed Form is a record used by the Divisional Materials Manager to seek approval from the Divisional Returning Officer (DRO) for disposal of an identified quantity of waste. This record works in conjunction with the Rubbish and Recycling Processing Guide at section 4.1.3 and the waste labels at section 4.2.2.

#### How did the measure seek to assist meeting or addressing the recommendation?

- The Divisional Materials Manager seeking approval from the DRO for disposal of waste advances recommendations 2 and 5 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence; in this case, the segregation of materials for disposal; and
  - Introducing a process for disposal of recycling and rubbish which ensures that no ballot material is inadvertently lost or destroyed.

#### Was it successful?

- The Record of Rubbish/Recycling Disposed Form was successfully utilised to authorise disposal of waste for the Griffith by-election.
- Implementation was not onerous.

#### How may it be improved?

- No identified improvements at this point

#### Is it scalable for future electoral events?

- The Record of Rubbish/Recycling Disposed Form is scalable for future electoral events.

#### Initial conclusion

KIT recommends adoption of the Record of Rubbish/Recycling Disposed Form as a measure central to implementation of a number of Keelty recommendations.

### 4.3.2 Ballot Paper Despatch: Printer to AEC Location Manifest

The Ballot Paper Despatch: Printer to AEC Location Manifest Form was a pre-existing form to track movement of ballot papers between the printer and AEC office. For the Griffith by-election KIT mandated its use.

#### How did the measure seek to assist meeting or addressing the recommendation?

- An enhanced Ballot Paper Dispatch: Printer to AEC Location Manifest Form to track movement of ballot papers between the printer and AEC office advances recommendations 2, 9 and 12 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence; in this case, from production to delivery to the AEC;
  - Instituting a culture of security in ballot handling; and
  - Introducing processes for the handling of ballot papers 'from cradle to grave'.

#### Was it successful?

- In its current form it fills a gap in the tracking process which has hitherto been addressed via the use of localised consignment.
- It will enable states to track the dispatch and receipt of interstate ballot paper stock for future electoral events.
- The use of this form will bring national consistency to the process of printer to AEC office transfer.

#### How may it be improved?

- The Griffith Materials Planning Officer needed to make ad hoc adjustments to the form to make it usable for the unique way in which ballot papers were transferred between the printer and Queensland State Office for the by-election. Once these adjustments were made the form successfully provided a paper trail for the transfer of custody from printer to AEC office.
- Based on the experience in Griffith and on feedback received from another materials planning officer, the form has been adjusted to accommodate a variety of delivery/pick-up scenarios. It has also been changed to include the option to track the receipt of Group Voting Ticket (GVT) and candidate booklets.
- Further review of the form should take place following future electoral events if the measure is implemented. Further evaluation of this form should include an examination of other possibilities for tracking dispatch from printer to offices, such as bar-coding and scanning.
- Renumbering the form to fit in with a new EF number allocation related specifically to ballot paper tracking.

#### Is it scalable for future electoral events?

- Application of this process is scalable for future electoral events rather than introducing an additional step or process, as use of the form brings about national consistency to established processes.

### Initial conclusion

- KIT recommends mandating the use of the Ballot Paper Despatch: Printer to AEC Location Manifest form for use at future electoral events.

### 4.3.3 Polling Place Ballot Paper Tracking Form

The Polling Place Ballot Paper Tracking Form is a new form and tracks the transfer of custody of ballot papers at the polling place level (including pre-poll voting centres, mobile polling teams and polling place liaison officer allocations) from allocation to a polling place, through the post-polling day processes such as fresh scrutiny, to dispatch of ballot papers to couriers ahead of final storage.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Tracking the transfer of custody of ballot papers at the polling place level through the post-polling day processes advances recommendations 2, 4, 9 and 12 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence by being able to record transfer of ballot papers at all times under AEC control;
  - Acknowledging that not all individuals are 'logistics professionals' and introducing this control relating to the movement of ballot papers;
  - Instituting a culture of security in ballot handling; and
  - Introducing processes for the handling of ballot papers 'from cradle to grave'.

#### Was it successful?

- The Polling Place Ballot Paper Tracking Form provided a physical record of transfer of custody of ballot papers in a specific manner.
- KIT witnessed correct completion of these forms up to the completion of fresh scrutiny for a number of polling places and received feedback from staff that they were user-friendly and fit for purpose.
- At the time of writing ballot papers for the Griffith by-election had not yet been dispatched for final storage; completed examples of the Polling Place Ballot Paper Tracking Form are yet to be reviewed.

#### How may it be improved?

- Further training for staff on correct completion will be required for future electoral events.
- Adequate filing and security of the Polling Place Ballot Paper Tracking Form, and compliance mechanisms to ensure the forms are progressively completed by Divisional staff need to be considered further.

- The Polling Place Ballot Paper Tracking Form will continue to evolve as more feedback is received. The form would benefit from a review but the AEC's internal Design Studio.
- Renumbering the Polling Place Ballot Paper Tracking Form to fit in with a new EF number allocation related specifically to ballot paper tracking.
- Possible development of an adjusted Polling Place Ballot Paper Tracking Form for pre-poll voting centre ballot papers and mobile polling ballot papers.

#### Is it scalable for future electoral events?

- The Polling Place Ballot Paper Tracking Form is scalable for future electoral events.
- The Polling Place Ballot Paper Tracking Form has been adjusted for future electoral events to introduce greater flexibility for the tracking of ballot papers in rural divisions (where transfer of ballot papers may be unavoidably transferred via a third party), and to create a separate, slightly different form for Senate tracking; so as to ensure scalability of the form's application. This was based on feedback from key stakeholders.

#### Initial conclusion

- KIT recommends the adoption of the Polling Place Ballot Paper Tracking Form as a measure central to implementation of a number of Keelty recommendations.

#### **4.3.4 Declaration Count Ballot Paper Tracking Form**

The Declaration Count Ballot Paper Tracking Form is a new form and tracks the transfer of custody of ballot papers at the declaration count level from the completion of preliminary scrutiny through to dispatch of ballot papers to courier ahead of long-term storage. The Declaration Count Ballot Paper Tracking Form operates in the same manner as the Polling Place Ballot Paper Tracking Form however its application is to declaration ballot papers, such as provisional votes, rather than ordinary ballot papers.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Tracking the transfer of custody of declaration ballot papers at the polling place level through the post-polling day processes advances recommendations 2, 4, 9 and 12 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence by being able to record transfer and custody of ballot papers at all times under AEC control;
  - Acknowledging that not all individuals are 'logistics professionals' and introducing this control relating to the movement of ballot papers;
  - Instituting a culture of security in ballot handling; and

- Introducing processes for the handling of ballot papers ‘from cradle to grave’.

#### Was it successful?

- The Declaration Count Ballot Paper Tracking Form provided a physical record of transfer of custody of ballot papers in a specific manner.
- The Declaration Count Ballot Paper Tracking Form provided a mechanism for tracking live declaration envelopes from the completion of preliminary scrutiny through further scrutiny to final storage.
- It may also assist Divisions in balancing declaration envelopes more readily. Griffith staff have completed the form accurately and progressively and found it to be user-friendly and fit for purpose.

#### How may it be improved?

- More thorough training for staff on proper completion will be required for future electoral events.
- Adequate filing and security of the forms, and compliance mechanisms to ensure the forms are progressively completed by Divisional staff needs to be considered further.
- The form will continue to evolve as more feedback is received. The form would benefit from going through the AEC’s internal Design Studio.
- Although declaration envelopes are tracked prior to the Declaration Count Ballot Paper Tracking Form via the declaration vote exchange in ELMS, KIT is working towards improved tracking and controls for this process, particularly at the point of receipt of declaration envelopes between Divisions.
- Renumbering the Declaration Count Ballot Paper Tracking Form to fit in with a new EF number allocation related specifically to ballot paper tracking.

#### Is it scalable for future electoral events?

- The Declaration Count Ballot Paper Tracking Form is scalable for future electoral events.
- The Declaration Count Ballot Paper Tracking Form underwent the same adjustments as the Polling Place Ballot Paper Tracking Form to provide flexibility and scalability of its application.

#### Initial conclusion

- KIT recommends adoption of the Declaration Count Ballot Paper Tracking Form as a measure central to implementation of a number of Keelty recommendations.

#### 4.3.5 Daily Exchange of Ballot Papers Form

The Daily Exchange of Ballot Papers Form tracks ballot boxes and stocks of unused ballot papers from a pre-poll voting centre or mobile team that are returned to a central point for secure overnight storage.

##### How did the measure seek to assist meeting or addressing the recommendation?

- The Daily Exchange of Ballot Papers Form tracks ballot boxes from a pre-poll voting centre or mobile team that are returned to a central point for secure overnight storage advances recommendations 2, 4, 9 and 12 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence by being able to record transfer of ballot papers at all times under AEC control;
  - Acknowledging that not all individuals are 'logistics professionals' and introducing this control relating to the movement of ballot papers;
  - Instituting a culture of security in ballot handling; and
  - Introducing processes for the handling of ballot papers 'from cradle to grave'.

##### Was it successful?

- The Daily Exchange of Ballot Papers Form provided a clear record of ballot box and unused ballot paper movement from the pre-poll centre to the divisional office for overnight storage. The form was completed accurately and on time by relevant staff.
- Had there been a need to investigate the whereabouts of the pre-poll ballot boxes or unused ballot paper stocks belonging to pre-poll voting centres, the tracking form would have provided clear guidance.

##### How may it be improved?

- The form is functional, however the size of certain fields should increase.
- Renumbering the Daily Exchange of Ballot Papers Form to fit in with a new EF number allocation related specifically to ballot paper tracking.

##### Is it scalable for future electoral events?

- The Daily Exchange of Ballot Papers Form is scalable for future electoral events.

##### Initial conclusion

- KIT recommends adoption of the Daily Exchange of Ballot Papers Form for use at future electoral events.

#### 4.3.6 Ballot Paper Transport Exception Form

The Ballot Paper Transport Exception Form is a form that enables the transfer of custody to be tracked in instances where a particular transfer scenario is not explicitly provided for in a dedicated form.

##### How did the measure seek to assist meeting or addressing the recommendation?

- Enabling the transfer of custody of ballot papers to be tracked advances recommendations 2, 4, 9 and 12 by:
  - Giving practical effect to the development and application of national and state material management policies for all stages of a ballot paper's existence by being able to record transfer of ballot papers at all times under AEC control;
  - Acknowledging that not all individuals are 'logistics professionals' and introducing this control relating to the movement of ballot papers;
  - Instituting a culture of security in ballot handling; and
  - Introducing processes for the handling of ballot papers 'from cradle to grave'.

##### Was it successful?

- This exception based form was used in the Griffith by-election on a number of occasions (such as the secure transfer of pre-poll ballot papers between State Office levels).
- The Ballot Paper Transport Exception Form has further application across the AEC to track when ballot papers are moved for operational reasons such as a change in storage arrangements.
- The use of this form in a number of scenarios across the organisation point to its importance going forward.

##### How may it be improved?

- Adjustments to the Ballot Paper Transport Exception Form have been made to include the mode of transport and to enable a free text information section as applicable.
- Samples of used forms are being progressively collected to determine whether repeat scenarios indicate a need for specific forms.
- Renumbering The Ballot Paper Transport Exception Form to fit in with a new EF number allocation related specifically to ballot paper tracking.

##### Is it scalable for future electoral events?

- The Ballot Paper Transport Exception Form is scalable for future electoral events.



### Initial conclusion

- KIT recommends adoption of the Ballot Paper Transport Exception Form for use at future electoral events.

### 4.3.7 Ballot Paper Security Direction and Acknowledgement

Polling officials who receive face-to-face training sign an acknowledgement that they understand and will uphold the AEC's ballot paper security principles regarding the sanctity of the ballot paper.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Polling officials signing an acknowledgement that they understand and will uphold the AEC's ballot paper security principles advances recommendations 12, 14 and 27 by:
  - Introducing processes for handling of ballot papers from 'cradle to grave';
  - Specifying and defining the role of employees at every stage of the ballot handling process; and
  - The AEC assuring itself, to the best of its ability, of the political neutrality of all persons handling ballot papers.

#### Was it successful?

- For the Griffith by-election every polling official who received face to face training signed the acknowledgement.
- This reinforced the gravity of the message and gave the AEC an assurance that key polling officials understood their role in implementing the measures

#### How may it be improved?

- To assist polling officials to understand the practical application of the measures, further information and examples could be provided around ballot paper secure zones at polling places as well as adequately securing ballot papers in their possession prior to polling day.
- The direction and acknowledgement should also be made more generic so that all AEC staff sign prior to undertaking their duties.
- The Ballot Paper Security Direction and Acknowledgement Form could be an addition to offer of acceptance documents in AEC Employment for polling and temporary staff and could be signed by permanent and intermittent / irregular staff at issue of writ in a similar vein to the current Undertaking to be Made by Officers and Employees Form.

#### Is it scalable for future electoral events?

- The Ballot Paper Security Direction and Acknowledgement Form is scalable for future electoral events.



### Initial conclusion

- KIT recommends adoption of the Ballot Paper Security Direction and Acknowledgement Form as a measure central to implementation of a number of Keelty recommendations.

### 4.3.8 Record of Ballot Box Contents Form

The Record of Ballot Box Contents Form provides a visible account of the content of a sealed moulded ballot box - the record is stored in a plastic sleeve attached to the outside of the box. Due to the fixed size of moulded ballot boxes the Record of Ballot Box Contents Form is generally only applicable for storage of House of Representative or Referendum ballot papers as Senate ballot papers would be too large to stack into the boxes used for the Griffith by-election.

### How did the measure seek to assist meeting or addressing the recommendation?

- Affixing a visible account of the content of a sealed moulded ballot box using ballot evident material advances recommendations 9, 12 and 13 by:
  - Instituting a culture of security in ballot handling;
  - Introducing processes for the handling of ballot papers 'from cradle to grave'; and
  - Using tamper evident material for the transfer and storage of ballot papers.

### Was it successful?

- The Record of Ballot Box Contents Form was intended to be utilised for storage of House of Representative parcels, packaged together for the return of materials from a polling place, but in the Griffith by-election was only utilised for declaration counts as moulded ballot boxes were already being used for housing House of Representative parcels.
- The measure was initially overlooked by staff in Griffith for the first box of preliminary scrutiny envelopes because a localised version was being used. However after this oversight was corrected, the record was used for all boxes containing declaration envelopes and assisted the Division to plan their scrutines and monitor the movement of ballot papers.

### How may it be improved?

- An addition of fields on the form to capture a third seal for sealing both sides of the ballot box as well as the flap on the lid is required
- Renumbering the Record of Ballot Box Contents Form to fit in with a new EF number allocation related specifically to ballot paper tracking.
- This is an important measure for future electoral events and is closely tied to KIT's recommendation to store House of Representative or Referendum packages in sealed ballot boxes during fresh scrutiny and (for House of Representatives)

distribution of preferences. This should be integrated into the Election Procedures Manual (EPM).

Is it scalable for future electoral events?

- The Record of Ballot Box Contents Form is scalable for future electoral events where moulded ballot boxes are used for storage of House of Representatives or Referendum ballot paper packages.

Initial conclusion

- KIT recommends adoption of the Record of Ballot Box Contents Form for use at future electoral events.

## 4.4 Staff and training

### 4.4.1 Additional ballot paper security slides for Training of Polling Staff

The inclusion of 4 additional slides in the existing Training Of Polling Staff (TOPS) training slideshow outlined the changes implemented as a result of the Keelty recommendations.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Enhanced and additional training for polling officials advances recommendations 9, 14, 27 and 31 by:
  - Instituting a culture of security in ballot handling;
  - Specifying and defining the role of employees at every stage of the ballot handling process;
  - The AEC assuring itself, to the best of its ability, of the political neutrality of all persons handling ballot papers; and
  - Improving learning and development processes and content.

#### Was it successful?

- The additional slides delivered background and practical information for polling staff.
- For the Griffith by-election, presenters were advised to read the text directly from the slides to ensure that they did not miss any key detail.
- Part of the success of this measure can be attributed to the willingness and dedication of the DRO to engage in implementing the changes for the Griffith event.

#### How may it be improved?

- After the first TOPS session was delivered, greater detail was included in the slides. The slides will continue to be reviewed.
- To ensure the message is robust, further detail will be included in the online training and the Election Procedures Handbook.
- To ensure presenter familiarity with the measures, a Gateway module will be developed and TOPS will be adjusted to accommodate the Keelty messages throughout presentations.

#### Is it scalable for future electoral events?

- Inclusion of the additional TOPS slides relating to ballot paper security is scalable for future electoral events.

#### Initial conclusion

- KIT recommends adoption of the TOPS slides relating to ballot paper security as a measure central to implementation of a number of Keelty recommendations.

#### 4.4.2 Election Procedures Handbook addendum

A one page addendum was included in the Election Procedures Handbook to highlight to senior polling staff the AEC's renewed focus on, and expectations regarding, the sanctity of ballot papers.

##### How did the measure seek to assist meeting or addressing the recommendation?

- The addendum to the Election Procedures Handbook advances recommendations 9, 14 and 27 by:
  - Instituting a culture of security in ballot handling;
  - Specifying and defining the role of employees at every stage of the ballot handling process; and
  - The AEC assuring itself, to the best of its ability, of the political neutrality of all persons handling ballot papers.

##### Was it successful?

- The addendum was one of a number of measures to communicate the ballot paper sanctity message to senior polling officials. Used with the suite of other measures the addendum was successful in ensuring that senior polling officials understood the gravity of the Keelty recommendations and the AEC's commitment to ensuring the sanctity of the ballot paper.
- This addendum was supported by a 'just in time' email sent to polling officials with the same messaging, an explanation of the new measures in the TOPS face-to-face session, and a ballot paper security direction and acknowledgement that was signed by all polling officials who attended a face-to-face session.

##### How may it be improved?

- For the Griffith by-election the addendum was printed on yellow paper and inserted into the EPM. For future events it should become a permanent part of the EPH.
- Consideration will be given to whether it should be on a brightly coloured sheet of paper in order to ensure it stands out with further consideration given to how it should be distinguished from other parts of the Election Procedures Handbook.

##### Is it scalable for future electoral events?

- Inclusion of the addendum in the Election Procedures Handbook is scalable; however it should be a permanent inclusion in subsequent Election Procedure Handbooks.

##### Initial conclusion

- KIT recommends:
  - Including the addendum with key messages in the Election Procedures Handbook addendum for future electoral events; and
  - That the message should be a permanent inclusion for subsequent Election Procedure Handbooks.

#### 4.4.3 Email to Griffith polling staff

An email was sent to all confirmed Griffith polling staff to reinforce an important message that was included as an addendum to the Election Procedures Handbook. The message outlined the AEC's renewed focus on ballot paper integrity and security resulting from the Keelty Report's recommendations

##### How did the measure seek to assist meeting or addressing the recommendation?

- Disseminating the ballot paper principles to polling officials advances recommendations 9, 14 and 27 by:
  - Instituting a culture of security in ballot handling
  - Specifying and defining the role of employees at every stage of the ballot handling process; and
  - The AEC assuring itself, to the best of its ability, of the political neutrality of all persons handling ballot papers.

##### Was it successful?

- The email reinforced:
  - the AEC's ballot paper principles; and
  - the polling officials' obligation to uphold those principles as agents of the Commonwealth.
- The email was sent from the divisional office mailbox using an extract of confirmed polling officials from AEC Employment.
- The method chosen to deliver the email was successful in that only confirmed polling staff were contacted. Surveyed OICs and polling officials acknowledged receipt of the email.

##### How may it be improved?

- The message was sent as a screen shot (picture) of the letter. This meant that the text could only be presented in a small size as quality was lost when enlarged. Copying the text and pasting it onto the email's body would have been more effective.
- Alternative delivery methods could be explored to determine the best approach. Griffith staff considered sending a bulk SMS alert to let confirmed polling staff know an important email had been sent, though this was not possible in the available time frames.

##### Is it scalable for future electoral events?

- The method is scalable as each Division administers its own polling officials. The AEC Employment team will need to be engaged earlier than 2 weeks prior to polling day as was the case for the Griffith by-election.

### Initial conclusion

KIT recommends continuing the approach of 'just-in-time' messaging to polling officials to reinforce key messages prior to undertaking their duties for future electoral events.

#### 4.4.4 Visual identification for all AEC staff at polling places

The AEC mandated that all permanent and temporary polling staff, including Polling Place Liaison Officers (PPLOs) wore purple AEC branded bibs for the Griffith by-election.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Clear visual identification for all AEC staff in a polling place advances recommendation 14 by specifying and defining the role of employees at every stage of the ballot handling process.

#### Was it successful?

- This measure was very successful and readily highlighted to all present which individuals were the AEC staff at the polling place. All AEC staff were easily identifiable and from a management (OIC) perspective staff could be easily seen at all times, even if the polling place was very busy.
- Another successful aspect of this was the reinforcing to staff that they were AEC staff (thus reinforcing the other measures and the training they were given relating to ballot paper principles etc.) and that they were visible at all times.
- It was also a much more professional look to have all AEC staff wearing the same identifying vest. It showed professionalism and organisation, and provided a team-like atmosphere

#### How may it be improved?

- The vests that pull over the head (like a netball bib) were better suited to the purpose. A lot of staff left the vest open at the front and some therefore had it loosely draped over their shoulders which diminished the effect.
- The bib material should also be considered for hot and humid climates. A vest with Velcro where one can attach a placard on the front of the vest that clearly states the OIC, Issuing Officer, Ballot Box Guard roles etc. would be a useful enhancement. These placards can be changed as people rotate throughout the day. This would have even a greater impact on the staff and for the voters and would look even more professional than the measures in place for the Griffith by-election.

#### Is it scalable for future electoral events?

- This measure is scalable for future electoral events however adequate time is required for design and required procurement processes.

### Initial conclusion

- KIT recommends continuing the use of clear visual identification for polling staff for future electoral events, noting design and procurement timing requirements.

### 4.4.5 Divisional Materials Manager & Divisional Materials Manager Log

The Divisional Materials Manager's role is to undertake and record in the Division Material Manager Log a range of tasks central to secure ballot paper handling and proper rubbish processing.

#### How did the measure seek to assist meeting or addressing the recommendation?

- Creation of the Divisional Materials Manager advances recommendations 4, 14 and 15 by:
  - Acknowledging that not all individuals are 'logistics professionals' and introducing this control relating to the movement of ballot papers;
  - Specifying and defining the role of employees at every stage of the ballot handling process; and
  - Providing written instructions to individuals in specified roles.

#### Was it successful?

- The position was a successful measure in that it assigned a staff member the responsibility of policing ballot secure zones, facilitating ballot paper tracking, completing key forms and monitoring the disposal of rubbish.
- The log proved to be a crucial document for reminding the Divisional Materials Manager which forms to complete and for providing a place to record the names and signatures of staff acting on behalf of the Divisional Materials Manager.
- The Griffith by-election was not a realistic setting in which to assess this job role as:
  - It was a by-election and there were many experienced and capable permanent staff available to fulfil the requirements of this role;
  - APS6 acted as the Divisional Materials Manager for this event; and
  - The position was implemented well after the announcement of the by-election.

#### How may it be improved?

- The experience in Griffith suggests that the Divisional Materials Manager will need to be either an experienced and capable staff member.
- KIT will need to review the draft job profile to consider some scenario-based alternatives for DROs in order to meet the requirements. The experience for the Griffith by-election also reinforces that the Divisional Materials Manager should not act as the Fresh Scrutiny supervisor.

- Training for the Divisional Materials Manager will need to be developed including briefing materials, including a handbook as well as encompass operational training for DROs and Election Managers.

#### Is it scalable for future electoral events?

- Scalability is a concern ahead of future electoral events if experienced and capable staff are not readily available.
- It is an important measure but for operational reasons the AEC will probably need to accommodate a variety of interpretations of what constitutes a DMM. Further review should take place following future electoral events.
- Without the new Divisional Material Manager position it would be difficult to fully implement and maintain ongoing compliance with some recommendations.
- Additional election funding would need to be agreed for this initiative to be implemented nationally.

#### Initial conclusion

- KIT recommends adoption of the following for future electoral events:
  - The Divisional Materials Manager position; and
  - The Divisional Material Manager Log.
- Consideration of:
  - Alternate options for fulfilling the requirements of the position including training and work level standards to enhance the prospect for scalability.

#### **4.4.6 Allocating Ballot Box Guards to all polling places**

For the Griffith by-election, ballot box guards were assigned to all polling places. Due to voter flow in Griffith, this meant allocating an additional 5 positions and was therefore an inexpensive way to improve security of ballot boxes in the polling place in this instance.

#### How did the measure seek to assist meeting or addressing the recommendation?

- The allocation of ballot box guards at all polling places advances recommendations under recommendation 9 to 14:
  - Instituting a culture of security in ballot handling;
  - Instituting a concept of 'ballot secure zones' at all premises where ballot papers are handled or stored;
  - Ensuring ballot secure zones are cleared before the arrival of ballot papers and that they remain secure and 'sterile' at all times when ballots are present.
  - Introducing processes for the handling of ballot papers 'from cradle to grave'; and
  - Specifying and defining the role of employees at every stage of the ballot handling process.



#### Was it successful?

- This measure was successful where the initiative was properly understood by the OIC and polling official and less successful otherwise. For example some ballot box guards were standing close to the ballot box and actively ensuring that voters deposited their ballot papers before leaving the booth; others were less active.
- There were some instances where declaration vote ballot boxes were unattended for a period, or it wasn't obvious where the ordinary ballot box was located, so voters needed to be directed away from the declaration vote ballot box.

#### How may it be improved?

- The initiative was particularly effective where the OIC made appropriate use of the additional staff member and positioned the ballot box accordingly. This highlighted a need to further impress upon OICs the importance of polling place layout.
- Training of ballot box guards may benefit from practical examples of relating to their duties to ensure a consistent level of activity amongst this pool of polling officials. Complementary training for PPLOs may enable clearer instructions on polling day in the event of ambiguity.

#### Is it scalable for future electoral events?

- The ELMS staffing formulas currently allocate a ballot box guard when a polling place estimate is 700 votes or more; 2 guards are allocated when estimated votes are 5,000 or above.
- Nationally there are 7,538 static polling places and 5,297 ballot box guards assigned. The net impact of employing an additional 2,241 ballot box guards is just over \$845,000 in wage costs.
- There may be some savings in not needing to employ part time staff and scrutiny assistants in some polling places due to the employment of an additional full time staff member, however this would be minimal in comparison.
- Additional election funding would need to be agreed for this initiative to be implemented nationally.

#### Initial conclusion

- KIT recommends continuing the use of ballot box guards for future electoral events, noting the requirement of funding for some new measures.

#### **4.4.7 Allocating Polling Place Liaison Officer assistants**

For the Griffith by-election it was suggested that an assistant may assist with security of ballot papers held by the PPLO.

How did the measure seek to assist meeting or addressing the recommendation?

- The allocation of a PPLO assistant advances recommendations under 9 to 14:
  - Instituting a culture of security in ballot handling;
  - Instituting a concept of 'ballot secure zones' at all premises where ballot papers are handled or stored;
  - Ensuring ballot secure zones are cleared before the arrival of ballot papers and that they remain secure and 'sterile' at all times when ballots are present;
  - Introducing processes for the handling of ballot papers 'from cradle to grave';
  - Using tamper evident material for the transfer and storage of ballot papers; and
  - Specifying and defining the role of employees at every stage of the ballot handling process.

Was it successful?

- The original suggestion of an assistant was to ensure security of the spare ballot papers. However a more effective use of staff resources and expertise was to have experienced DROs accompany PPLOs as a mentoring exercise.
- Ensuring security of the spare ballot papers was achieved by providing sturdy backpacks for the PPLOs so they could have their spare ballot papers with them at all times. Whilst this was onerous, some utilised the "secure ballot paper zone" within the polling place as soon as they arrived in the polling place, securing the backpack there for the duration of their visit.

How may it be improved?

- The solution of sturdy backpacks for ballot papers may not be as effective for a Senate election. Perhaps a small wheeled suitcase/travel case could be considered instead of a back pack. This would give transport from the vehicle to the polling place and keep the ballot papers under the control of the PPLO at all times.
- Rather than an additional polling official assisting the PPLO, there may be more benefit in increasing the number of PPLOs and reducing the number of polling places allocated to a PPLO to ensure they are able to visit all of their polling places more than once.
- Reducing the number of polling places (increasing the number of PPLOs) would allow them to make the required number of visits and cover off all of the discussion points to ensure the polling is working efficiently.

Is it scalable for future electoral events?

- As was the case for additional ballot box guards, recruitment of more polling officials would necessitate additional election funding to be agreed upon for this initiative to be implemented nationally.

Initial conclusion

- KIT recommends further exploration of options of how best to allocate specific staff for the oversight of ballot paper security across multiple polling places; noting that while PPLO assistants were a suitable solution for the Griffith by-election, there are better approaches for future events.

## 5. Conclusion

A large volume of work was undertaken by the AEC to implement interim measures and activities for the Griffith by-election that form part of the AEC response and commitment to fully implementing all 32 recommendations contained in the Keelty Report.

This Report found that the majority of the measures advanced the AEC full implementation of the Keelty Report's recommendations and made various suggestions for improvements for subsequent electoral events for KIRG consideration.

This evaluation has provided an indication of which measures and activities will enable the AEC to effectively meet the recommendations. These measures and initiatives will continue to be evaluated at subsequent electoral events in order to constantly improve practices and operationalise all of the Keelty Report's recommendations for full implementation.

## Appendix A: Keelty Recommendations Advanced at the Griffith by-election.

The Keelty Report contained 32 recommendations. Of the 32 recommendations, the following five were deemed not to be applicable to the conduct to the Griffith by-election and out of scope for the purposes of this evaluation;

- Recommendation 16 relates to establishing policies and procedures for the conduct of a Senate recount;
- Recommendation 18 relates to cross posting senior staff across States;
- Recommendation 26 relates to implementing measures to ameliorate the logistical issues arising out of the size of the Senate ballot paper and pressure relating to expectation that all results will be known on election day;
- Recommendation 29 relates to the conduct of a check of storage and packaging of 'live ballots' in its possession (i.e. AEC warehouses); and
- Recommendation 32 relates to engagement with the Joint Standing Committee on Electoral Matters regarding statutory appointment of AEC State Managers.

The conduct of this evaluation, and providing options for improvement for future electoral events, advances the following three recommendations that did not have specific measures for the conduct of the Griffith by-election:

- Recommendation 1 relating to benchmarking of material management systems against industry and other electoral management body standards;
- Recommendation 28 relates to the AEC conducting regular reviews of the culture of its regional offices to ensure full adherence to national policies and procedures; and
- Recommendation 30 relates to that the AEC ensures that lessons learned from post-election evaluations are acted upon pursuant to future electoral events.

The remaining Keelty recommendations were directly effected in some way by the implementation of the 27 measures evaluated in this report. The Table at Appendix B outlines what recommendations were advanced by the measure (identified by reference to the paragraph of this evaluation report).

## Appendix B: Reference Table of Keelty Recommendations Advanced at the Griffith by-election

| Keelty Rec.                        | Guidelines, standards and directions |       |       |       |       |       |       |       |       | Secure labels & seals |       |       | Forms for AEC staff |       |       |       |       |       | Staff & Training |       |       |       |       |       |       | Appendix 1 |       |       |   |  |  |  |
|------------------------------------|--------------------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-----------------------|-------|-------|---------------------|-------|-------|-------|-------|-------|------------------|-------|-------|-------|-------|-------|-------|------------|-------|-------|---|--|--|--|
|                                    | 4.1.1                                | 4.1.2 | 4.1.3 | 4.1.4 | 4.1.5 | 4.1.6 | 4.1.7 | 4.1.8 | 4.1.9 | 4.2.1                 | 4.2.2 | 4.2.3 | 4.3.1               | 4.3.2 | 4.3.3 | 4.3.4 | 4.3.5 | 4.3.6 | 4.3.7            | 4.3.8 | 4.4.1 | 4.4.2 | 4.4.3 | 4.4.4 | 4.4.5 |            | 4.4.6 | 4.4.7 |   |  |  |  |
| Logistics & Material MGMT          | 1                                    |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       | ✓ |  |  |  |
|                                    | 2                                    |       |       | ✓     |       |       | ✓     |       | ✓     | ✓                     | ✓     | ✓     | ✓                   | ✓     | ✓     | ✓     | ✓     | ✓     |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 3                                    |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 4                                    |       | ✓     |       |       |       | ✓     | ✓     |       | ✓                     |       |       |                     |       |       | ✓     | ✓     | ✓     | ✓                |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 5                                    |       |       | ✓     |       |       |       |       |       |                       | ✓     |       |                     | ✓     |       | ✓     | ✓     | ✓     | ✓                |       |       |       |       |       |       |            |       |       |   |  |  |  |
| K MGMT                             | 6                                    |       |       |       |       |       |       | ✓     |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 7                                    |       |       |       |       |       |       | ✓     |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 8                                    |       |       |       |       |       |       |       | ✓     |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
| BP Security                        | 9                                    | ✓     |       |       |       | ✓     | ✓     |       |       |                       |       | ✓     |                     | ✓     | ✓     | ✓     | ✓     | ✓     |                  | ✓     | ✓     | ✓     |       |       |       |            | ✓     | ✓     |   |  |  |  |
|                                    | 10                                   |       | ✓     |       |       | ✓     |       |       |       |                       |       | ✓     |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            | ✓     | ✓     |   |  |  |  |
|                                    | 11                                   |       | ✓     |       |       | ✓     |       |       |       |                       |       | ✓     |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            | ✓     | ✓     |   |  |  |  |
|                                    | 12                                   | ✓     |       |       |       | ✓     | ✓     |       |       |                       |       | ✓     |                     | ✓     | ✓     | ✓     | ✓     | ✓     | ✓                | ✓     |       |       | ✓     |       |       |            | ✓     | ✓     |   |  |  |  |
|                                    | 13                                   |       |       |       |       | ✓     |       |       |       | ✓                     |       | ✓     |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            | ✓     | ✓     |   |  |  |  |
| Processes, Procedures & Compliance | 14                                   |       |       |       |       | ✓     |       |       |       |                       |       |       |                     |       |       |       |       |       | ✓                |       | ✓     | ✓     | ✓     | ✓     | ✓     | ✓          | ✓     | ✓     |   |  |  |  |
|                                    | 15                                   |       |       |       |       | ✓     |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       | ✓          |       |       |   |  |  |  |
|                                    | 16                                   |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 17                                   |       |       |       |       |       |       | ✓     |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 18                                   |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 19                                   |       |       |       |       | ✓     |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 20                                   |       |       |       | ✓     | ✓     |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 21                                   |       | ✓     | ✓     | ✓     |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 22                                   |       |       |       |       |       |       |       |       | ✓                     |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 23                                   |       |       |       |       |       |       |       |       |                       |       | ✓     |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 24                                   |       |       |       |       |       |       |       |       |                       |       | ✓     |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
| 25                                 | ✓                                    |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
| Culture                            | 26                                   |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 27                                   |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 28                                   |       |       |       |       |       |       | ✓     |       |                       |       |       |                     |       |       |       |       |       |                  | ✓     |       | ✓     | ✓     |       |       |            |       |       |   |  |  |  |
| Other                              | 29                                   |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 30                                   |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |
|                                    | 31                                   |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       | ✓     |       |       |       |            |       |       |   |  |  |  |
|                                    | 32                                   |       |       |       |       |       |       |       |       |                       |       |       |                     |       |       |       |       |       |                  |       |       |       |       |       |       |            |       |       |   |  |  |  |