

▶ Report on Observation of
NSW Electoral Commission
Central Vote Count
September 2008
Local Government Elections

17 October 2008

Report on Observation of New South Wales Electoral Commission Central Vote Count

Foreword to the Electoral Commissioner

The NSW Central Vote Count Observation team have completed the tasks as set out in the Terms of Reference.

On behalf of the observation team, I am pleased to submit to you, our final report.



Glenda Frazer (Chair)

Overview

The New South Wales Electoral Commission (NSWEC) established an independent group of people to be the central vote count observation team in connection with the New South Wales local government elections conducted in September 2008 and counted at the central vote count centre in Riverwood, Sydney.

The observation team consisted of Glenda Frazer, Manager Elections Services, Victorian Electoral Commission (Chair), Peter Coulton, Director Corporate Services, Local Government and Shires Association of NSW and Wayne Trudgen, Principal Policy Officer, Department of Local Government.

Terms of Reference

The NSWEC established 'Terms of Reference' for the team. These were discussed at an initial meeting of the team with Colin Barry, Electoral Commissioner and Brian Decelis of the NSWEC at a meeting held at the NSWEC on Thursday 10 July 2008.

The Terms of Reference were:

1. To review the NSWEC's preparations for the central vote count of those local Government areas and wards where proportional representation voting applies and there are group voting squares above the line.
2. To review the security and set up of the central vote count centre and to be satisfied that the NSWEC's security arrangements are appropriate, taking into consideration similar arrangements in other electoral jurisdictions in Australia for such election counts.
3. To review the NSWEC's plans for advising candidates and councils of the time when their ballot papers will be counted in the central vote count centre.
4. To review the NSWEC's operational layout of the central vote count centre and be satisfied that quality control measures are in place to ensure that there is no mix up in ballot papers being data entered.
5. To observe the operation of the central vote count centre and be satisfied that the NSWEC's operational plans have been implemented.
6. To write a report to the Electoral Commissioner following the observation team's inspections and review of documentation, commenting on any aspect of the NSWEC's preparations for and management of the central vote count centre.

Background

The observation team were provided with copies of all documentation supporting the count process. The documentation included:

- Verification procedures
- Data entry procedures
- Counting staff organisation structure
- Position descriptions
- LG counting centre procedures
- LCLG count software project management plan
- LGCC project management plan
- LGCC disaster recovery and security summary
- LCLG system operation test plan
- LGCC IT infrastructure and support services specification.

Brian Decelis presented an overview of the count process to the observation team and subsequently provided a copy of the presentation to the team. Team members reconvened on Wednesday 30 July 2008 to discuss individual reviews of the documentation and to establish the observation areas.

A consolidated list of councils to be counted at the count centre including the total number of electors, estimated returns and estimated total number of ballot papers to be transported to the count site was distributed to team members before the meeting.

A number of items were identified while discussing the documentation provided to the team. These included:

- *Absence of detailed plan or time schedule for the count*
Whilst it was agreed detailed documentation had been provided the panel were unable to get a clear handle on how the lay out and flow of ballot papers had been determined given the absence of documentation supporting the estimated number of ballot papers to be counted at the count centre. This item was raised with NSWEC in late July however the team was informed that numbers wouldn't be known until the close of nominations. The team felt that some estimates documentation based on previous count times and ballot paper numbers would have been useful as it would

assist in getting an understanding of the size of the count and would give better estimates of scheduling, count times and anticipated volumes of ballot papers. This became more apparent once details of the number of ballot papers to be managed at count site had been distributed

- Concerns were raised regarding the costing for NSW local government elections and felt that better estimates would assist with costing. After some discussion it was agreed that this area was outside the scope of the panel and should be discussed directly between LGSA and NSWEC.
- The team noted the absence of the inclusion of a flow chart of the whole end to end process in the documentation provided and were unable to get a clear understanding of the flow of ballot papers from the returning officers to Riverwood.
- Security of ballot papers during transport and at Riverwood is not apparent. The matter was raised re the distance that some papers had to travel that could mean possible overnight stays during the journey etc. It is unclear what security arrangements are in place in these instances given that driver fatigue and OH & S need be considered during long journeys.
- The panel could not get a good feel of the area identified at Riverwood for the receipt of ballot papers. Tied into the delivery and lack of a schedule of delivery, would the area cope where numerous deliveries and volumes arrive at the same time? There didn't seem to be enough space to expand the receiving and record & reconciliation areas. Management of incoming ballot papers is considered extremely important.
- Concerns were raised by all panel members in the size of batches to be created and managed. Balancing and reconciliation of ballot papers is considered extremely important and smaller batches may be easier to manage because:
 - Risk is reduced during change of shifts
 - There is the ability to remove ballot papers from data entry tables and secure overnight
 - Risk is inherent with the use of sticky notes
- The team was unclear as to what information would be available during the count re the count process.

- The issue was raised re the rationale of the priority list, after some discussion the team agreed that this was out of scope for the team and the responsibility of the NSWEC.
- Overall it was agreed that some of the items discussed would become clearer once the process was observed.
- The absence of an OH & S checklist within the documentation was noted.
- The team noted the absence of checklists for each area of the count set up.
- The team also noted the absence of a 'code of conduct' for count centre staff and also the absence of data entry staff briefing notes.

Ballot paper preparation at returning office

Three types of ballot papers were used for voting for councillors during the local government elections:

- legislative assembly type (counted locally by RO)
- groups with no group voting squares (no ATL - counted locally by RO)
- groups with group voting squares (ATL - counted at LGCC)

Only ballot papers with above-the-line (ATL) and below-the-line (BTL) voting were counted at the central count centre. A preliminary count of all ballot papers took place at polling places on election night. Additionally counts took place for declaration votes (silent, declared institution, postal, pre-poll and section votes). On Sunday after Election Day ballot papers were reconciled and sorted to single ATL (Single I, ✓ or X Above The Line) and 'others'. The single ATL ballot papers were retained at the returning office and all other ballot papers were transported to the count centre. Each parcel of ballot papers for each polling place and declaration vote type were kept in separate parcels at all times.

Returning officers, working parcel by parcel batched ballot papers for the count centre into batches of 100 ballot papers (some short batches had less than 100 ballot papers), placing a post-it note at every 25 papers. Batches were hole punched, a backing card attached and plastic sleeve

inserted at the front of the batch before being secured with a tie tube clip.

Scrutineers were present during the sorting and batching process.

Completed batches were secured in plastic bags ready for transport to the count centre.

Count observation

Utilising documentation provided by the NSWEC and from discussion held between observation team members an observation checklist was developed

The checklist covered all aspects of the count and considered a number of main areas:

- Set up at count centre
- Ballot paper handling prior to count
- Procedures prior to count commencement
- The count
- Results processing
- Disaster recovery

A copy of the checklist can be found at Appendix I.

The observation team attended the Riverwood count centre on Tuesday 16 September 2008 at 9:30am. The count centre had been established in the NSWEC warehouse facility at Riverwood. Secure sign in procedures were followed by NSWEC staff at the count centre and observation team members were each issued with a security pass. Observation team members were given a guided tour of the facility and an overview of each stage of the count process from delivery of ballot papers to the storage procedures at the end of the count. Team members were then free to independently move within the count centre to observe processes and procedures and to converse with NSWEC staff re any questions raised during the observation.

Below are detailed notes from the observation team re the count process.

Set up at count centre

Referring to *Local Government Counting Centre Procedures* items 12.12 and 12.13, the observation team reviewed the layout of each area of the count

centre. The proposed layout of the centre was clearly documented and well thought out with good flow of traffic and ballot papers. The observation team had no issues with the layout of the count centre. The team questioned what OH&S considerations been made and implemented at the count centre. It was agreed that to a degree OH&S considerations had been made. Team members were made to wear fluorescent vests when entering areas where forklifts or traffic were in operation. Of concern was the lack of large scale clearly visible emergency management plans, especially important with the large number of staff at the venue at any one time. Also considered of value was clearly visible manual handling processes. It was noted that there was a lack of designated walkways or clearly defined parking bays for unloading trucks etc. This was considered of major concern for the safety of staff and visitors to the centre. Also noted as a concern was that sorted ballot papers were laid on pallets on the floor, each time staff needed to access the ballot papers it meant bending and lifting actions needed to be undertaken. Additionally there were concerns that staff could trip on the pallets or overbalance when trying to retrieve ballot papers.

Recommendations

For future counts it is recommended that the following OH&S management strategies be considered:

- Walkways to be clearly defined
- Vehicle parking and delivery areas be more clearly marked
- Ballot paper storage to be at waist height

Ballot paper handling prior to count

A number of areas were covered under this heading. These included:

- Receipt of ballot papers at count site
- Storage of ballot papers
- Flow of ballot papers
- Batch preparation

Below are details observed at each area.

Receipt of ballot papers at count centre

Detailed documentation was in place for the receipt of ballot papers. The plan was observed as being followed. The team was impressed with the methodology for the transport of ballot papers from returning offices to the count centre and receipt at the centre. TNT couriers fully managed this process and had a staff member located on site at the count centre to receive deliveries ensuring all anticipated ballot papers were on each truck. This person was also in contact with each delivery driver and could follow up any delays or issues with each despatch.

Returning officers emailed the count centre with the number of bags of ballot papers dispatched, the number of bags received was checked against the email. Discrepancies were isolated and dealt with separately; these appeared to be minor during the time the observation team was in attendance. The one item noted by the team was that whilst plastic bags transporting ballot papers were security sealed, these seals were not in fact recorded and forwarded to the count centre for cross checking on receipt.

The observation team was happy that procedures and processes had been followed by returning officers and staff at the count centre.

Storage of ballot papers

Consideration was given to the ballot paper storage areas allocated at the count centre for each stage of the process. The team questioned if there was sufficient storage at each stage and agreed that in the main there was with the exception of data entry, where it was felt better delineation of areas for ballot papers to be data entered and those where data entry had been completed would be advisable.

The observation team had no concerns with the security of ballot papers.

Flow of ballot papers

The flow of ballot papers between each area of the count was extremely efficient. Transfer of ballot material through the various stages of the count was well managed. The team had no concerns or recommendations in this area.

Batch preparation

As batches were received from each office they were checked against the anticipated number of bags. Staff then checked and recorded the batches received for each polling place and declaration vote type. Where totals anticipated matched the ballot papers moved to the next stage of the process being registration of batches in system. Where numbers did not reconcile batches were set aside and then resolved through communication with the returning officer.

The number of ballot papers to be counted for each polling place were entered into the NSWEC computer system and totals entered reconciled against total anticipated. Once confirmed batch header sheets were generated for each polling place and declaration vote type. This process was undertaken by staff located on the upper level of the count centre. Staff were located completely separate to the receiving, reconciliation and data entry area. Paperwork was ferried between the levels, created batch header sheets were taken back to the lower level and inserted in the relevant clear plastic pockets attached to each batch of ballot papers. At this stage the papers were then ready for data entry. All batches ready for data entry were stored in a specific area at the centre and were moved to the relevant count team as required.

Comments

At all times it seemed that procedures were being followed and issues resolved where required in a timely manner. The batching process went smoothly, the only comment being the location of the batch header sheet preparation area to batch preparation and data entry. A great deal of running up and down stairs was involved.

Additionally the other observation was that the movement of staff between each area did seem to be uncontrolled at some times. Staff allocated to a particular work area were observed in unrelated areas. Not a major issue but did add to confusion of roles.

Recommendations

For future counts it is recommended that the following be considered:

- Ballot paper parcel seal numbers to be recorded by returning officers and forwarded to count centre for cross checking to ensure papers have not been tampered with.
- Increase the storage space during data entry to ensure ballot papers to be data entered and those where data entry had been completed are clearly spaced.
- Locate the batch header sheet preparation area closer to the batch preparation and data entry areas.

Staffing

The team were keen to observe the staff and their roles at the count centre. In the main, detailed positions descriptions had been developed and a project organisation plan established. The only position description not included was one for data entry staff. Our understanding is that this would have been provided to agencies who responded to requests for quote for the provision of the temporary staff.

From observation, staff were clear on their roles and responsibilities.

OH&S requirements

The observation team were slightly concerned as to staff understanding of OH&S requirements at the count site. It was agreed that high definition vests were worn in areas where required but overall there did not seem to be training or instructions to staff available at the centre that outlined their OH&S responsibilities nor proper evacuation procedures in the case of an emergency.

Recommendations

For future counts it is recommended that OH&S briefing of staff take place at each shift commencement and that OH&S documentation is displayed or readily available to staff at the count centre.

During the count

The observation team were able to observe start of shift procedures at the count centre. The check in process undertaken by the personnel agency that provided staff for data entry was impressive. It was an extremely well ordered procedure with data entry staff in place within each team in a very short time. The team appreciated the difficulty of the management of 200+ staff at one time. This process was well executed and the personnel agency should be commended. The agency had also provided staff to play the roles of team leaders/supervisors for each of the 10 teams. All were to attend the count centre in advance of the data entry staff to ensure data entry terminals were in readiness for the commencement of the data entry shift. This worked extremely well, batches of ballot papers were in place against each terminal by the time data entry staff appeared meaning once training of data entry staff had been completed there was no delay in commencing ballot paper preference entry into the count application. Team leaders and floor staff ran small training sessions of groups of data entry operators running them through the application and business processes surrounding the ballot paper entry. The software seemed pretty basic as far as the data entry staff were concerned, i.e. they did not seem to have trouble picking things up with only a fairly short training time. Data entry was underway in a short time.

The observation team had initial concerns with the management of ballot paper batches, especially given the fact that data entry operators seemed to have a high level of responsibility in the reconciliation of the ballot papers. It was also a concern that during shift change over partially entered batches would be closed and re-opened by the next shift operator raising the possibility of errors during data entry. These concerns proved to be unfounded, the process experienced worked as anticipated in the procedural manuals provided by the NSWEC.

The observation team were unable to observe end of shift processes, however it was felt that this was unnecessary given their confidence in procedures and processes in place.

The management and handling of batches prior to and during data entry was orderly and well managed. There were clearly defined, well labeled areas for ballot paper storage during each phase of data entry. Labels were affixed to trestle tables indicating storage location of ballot papers at each stage, i.e.

- Awaiting first round data entry
- Awaiting second round data entry
- Awaiting verification
- Verified batches

The likelihood of incorrect preferences for candidates being translated and included in the results calculation was extremely remote given the number of processes ballot papers went through before a result was calculated.

First round data entry:

Batches of ballot papers were allocated to data entry operators by the supervisors. Working ballot paper by ballot papers, data entry operators entered ballot paper preferences exactly as completed by the voter into the count application. If an operator was unsure of any mark on a ballot paper, a yellow sticky dot was placed next to the mark and an interpretation of the mark was written onto the dot. Once all papers in a batch had been entered the batch was saved and closed.

Second round data entry

Batches completed for first round data entry were allocated to a different operator for second round data entry. Data entry operators re-keyed the batch of ballot papers, again exactly as completed by the voter.

Verification

Where the preferences entered at first round data entry did not match those entered at second round data entry, or if the total number of ballot papers entered at each stage did not match, the batches needed to be verified.

A third person then worked through each batch comparing the data entered and correcting inconsistencies or errors.

All batches had to be data entered and go through each of the three processes before they were available for results calculation.

Scrutineers

The observation team were not aware of a scrutineers briefing prior to count commencement. This could have taken place at a time when the team were in another area of the count site. One observation that did concern the team was some scrutineers interaction with the data entry operators. We observed what we considered to be an inappropriate interaction where a particular scrutineer was engaged in full scale debate with a data entry operator that the team felt led to the operator discussing/debating particular ballot papers. When brought to the attention of NSWEC staff this issue was rectified, however given that large amount of activity taking place at that time it did go un-noticed for some time.

NOTE: the observation team were not able to experience the results calculation process.

Recommendations

This process was extremely well managed. Processes were open and transparent at all times with little opportunity for errors to occur.

The only recommendation to be considered is for NSWEC count staff to be more alert to scrutineers and their interaction with data entry staff at the count site.

Disaster recovery

The team spent some time discussing and getting an understanding of the infrastructure supporting the count site and the disaster recovery procedures in place in case of any unexpected issues during the count. Whilst detailed documentation existed, it was not clear to the everyday person what this meant overall.

The teams understanding of this discussion was that where a hardware/software failure took place there would be quite a long delay to reset batches. Given that the system only saved batches at the completion of data entry of each batch there was the inability to recover a batch to the point of the 'disaster'. In fact batches were to be reset to the commencement of the batch.

Part of this issue seemed to relate to the fact that the count software was vested on only one server. The team raised the possibility of using two servers with a load balancer which would provide an inherent redundancy but were advised that the software could not cope with such an arrangement. We do not understand why this would be the case however we lack the technical expertise in this area to question this response.

The teams understanding may not be 100% correct and not being of an IT background we apologise if this has been misinterpreted.

Recommendations

It is recommended that consideration be given to enable the ballot paper save process to occur progressively during data entry to allow speedier, more manageable recovery should an incident occur allowing better protection of the integrity of the data.

Additional items

Referring to item 3 of the terms of reference the teams overall concern regarding the count process was what was considered as a lack of communication between the NSWEC, councils and candidates regarding the scheduling and availability of the counts.

The team could not see any clear rationale as to what guided the decisions and order in which councils were counted. While we observed no issue with this, it is suggested that those councils who were counted "last" may have struggled to understand why.

Additionally, the NSWEC could not make a detailed count schedule available to them to allow for planning of the observation timetable and to allow the team to get an understanding of the anticipated number of count days.

Once scheduling occurred, again this was not completed for the overall count but progressively, the NSWEC made a commitment that in the event of earlier count finishing times that counts scheduled for a particular day may commence

earlier than advised. However counts for another day would not be moved to a previously day where the count was ahead of schedule. The team was advised that this was so that candidates could schedule their scrutineers to be in attendance when their particular count was being data entered. This type of information and reasoning, from anecdotal stories during and after the election process did not seem to be widely understood.

The observation team were not across how the counting schedule was communicated other than via the NSWEC website.

It should be noted that the process of recording results as they became available has been efficient. The EC website has been found to be easy to navigate and contains good detail.

The count team also noted that all counts came in ahead of schedule. Whilst this is to be commended it would be good to understand how this was achieved. Was this due to lower anticipated return of ballot papers, fewer candidates or that the schedule was wrong in the first place?

Conflict of Interest Declaration

All panel members completed conflict of interest declarations on 30 July 2008. See Appendix 2.

Peter Coulton advised the other members of the team that the Local Government & Shires Associations of NSW were involved on behalf of its members in a dispute with the Electoral Commission regarding a number of aspects in relation to the conduct and the costs of the elections.

It was acknowledged that the terms of reference established by the NSW Electoral Commissioner for the Central Count Observation Team placed the issues the Associations were disputing outside the scope of the Teams remit, as the scope was specific to the processes and procedures surrounding the central vote counting centre and did not cover all aspects of the election.

Overall comments

The observation team have no overall concerns with the NSWEC count process in accordance with the terms of reference provided to the team. Clear, precise procedures were in place and seemed to be followed. Ballot paper management and reconciliation, considered to be of the utmost importance by all team members, was well executed and raised no concerns.

The team was impressed with the count process and could not fault it, and feel that scrutineers and candidates should have no concerns regarding process, transparency and integrity of the central count conducted by the NSWEC.

The recommendations listed above are for consideration by the NSWEC, it is left to them to decide if they wish to take on board any suggestions.

Glenda Frazer, Peter Coulton and Wayne Trudgen
Observation team panel members

Dated:

17 October 2008

NSW Central Vote Count Observation

Tuesday 16 September 2008

			Yes/No	Comments
Set up at count centre	Layout	Is proposed layout clearly documented?	Yes	Refer LGCC process 12.12
		Are areas clearly defined?	Yes	Refer LGCC process 12.13
		Have OH & S considerations be made & implemented?		
Ballot Papers	Receipt at count centre	Is there a detailed plan for the receipt of ballot papers?	Yes	Refer LGCC process 5.1 & 5.2
		Is the plan being followed?		
		Are any details missing from the plan?		
		Are ballot papers received in orderly fashion?		
		Are there any discrepancies in number of boxes received vs. those expected?		
		If yes - how are these managed?		Refer LGCC process 5.2
		Are RO packaging instructions documented?	Yes	Refer LGCC process 2.2 & 4.1
		Were packaging instructions followed?		
		Were contents of box/es as described?		
		Is the receipt workflow followed?		
Storage at count site	Is there sufficient storage at each stage?			

		Are there any security concerns with storage?		
	Flow of ballot papers	Is there smooth flow of ballot papers between areas?		
	Batch preparation	Are reconciliation procedures documented?	YES	Refer LGCC process 6.2
		Are reconciliation procedures followed?		
		Are ballot papers batched as per instructions?		
		Are discrepancies managed and resolved?		
		Are batches stored in correct area ready for data entry?		

Prior to count commencement	Staff training	Are staff clear on requirements?		
		Are roles and responsibilities clearly defined?		
		Are staff clear on OH & S requirements?		

Count	Procedures	Are detailed procedures available?	Yes	See DEO Procedures
		Are data entry procedures being followed?		
		Are data entry - start of shift procedures working?		
		Are data entry - end of shift procedures working (including dealing with partially entered batches)?		See DEO procedures Chapter 5 page 10
	During first round data	Is manual counting of batches including adjustments taking place		See DEO procedures

entry	as described?		Chapter 4
	Are Post It notes being attached?		See DEO procedures Chapter 4
	Is there controlled movement of staff during count?		
	Is 'Next Ballot Paper for Data Entry Sheet' being completed when required		See DEO procedures Chapter 7
During second round data entry and verification	Are there clear procedures?	Yes	See Verification Procedures Chapter 8
	Are procedures being followed?		
	Are issues being identified and corrected?		See Verification Procedures Chapter 8.1
Once data entry completed	Are there procedures for final reconciliation?	Yes	See Verification Procedures Chapter 9.2
	Are all ballot papers reconciled?		
	Are completed ballot papers securely stored?		
Result calculation	Are there clear procedures?	Yes	See Verification Procedures Chapter 9.2 & 10
	Are they followed?		
	Do results calculate?		

Do number of ballot papers distributed = number at final reconciliation?

Additional items	Disaster recovery	Does detailed documentation exist?	Yes	See LCCC Disaster Recovery & Security Summary
		Is back up plan in place?	Yes	See LCCC Disaster Recovery & Security Summary
		Is data physically secure at venue?		


Appendix 2

NSW EC Central Count Observation

Conflict of Interest Statement

Central Count Observation Team

This is to certify that I do not hold any office, possess any property, am not engaged in any business, trade or calling and do not have any obligations by virtue of any contract whereby, directly or indirectly, duties or interests are, or might be created, in conflict with my position as a member of the Central Count Observation Team.

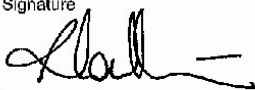
Name Glenda Frazer	Signature 
Title Manager, Election Services Victorian Electoral Commission	Date 30/7/08

NSW EC Central Count Observation

Conflict of Interest Statement

Central Count Observation Team

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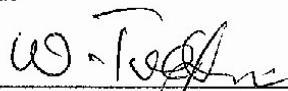
Name Peter Coulton	Signature 
Title Director, Corporate Services LGSA	Date 30.7.08

NSW EC Central Count Observation

Conflict of Interest Statement

Central Count Observation Team

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Name Wayne Trudgen	Signature 
Title Principal Policy Officer Department of Local Government	Date 30/1/08

**ELECTORAL COMMISSIONER'S RESPONSE
TO OBSERVATION TEAM'S REPORT
ON LOCAL GOVERNMENT CENTRAL COUNT**

I have received the report from the independent Observation Team into the central count centre for the 2008 Local Government elections.

I wish to thank all members of the Observation Team for their dedication and commitment to this project. As far as I am aware, this is the first time in Australia that an Electoral Commissioner has established an independent Observation Team to report on a key election outcome.

The purpose of establishing the Observation Team was to give candidates, registered political parties and members of the public confidence in the integrity, effectiveness and efficiency of the centralised count of ballot papers.

For certain Local Government elections (where candidates formed groups and there were group voting squares above the line) it is necessary to use a centralised computerised vote counting system.

Six Terms of Reference were established. I appointed three independent people with a senior experienced election official from the Victorian Electoral Commission as Chair, a representative from the NSW Department of Local Government and a representative from the Local Government and Shires Association of NSW. The New South Wales Electoral Commission (NSWEC) provided the Observation Team with detailed briefings on all aspects of the central count operations. The Observation Team was also provided with copies of all documentation relating to the counting operations. The Observation Team visited the central count operation during the data entry process.

I am pleased that the Observation Team was able to conclude that "scrutineers and candidates should have no concerns regarding processes, transparency and integrity of the central count conducted by the NSWEC".

The comments made by the Observation Team by way of recommendations will be carefully considered by the NSWEC in planning for future central vote counts.

Once again, I would like to thank all members of the independent Observation Team for their dedication and commitment to this important project.

A handwritten signature in blue ink that reads 'Colin Barry' with a long horizontal flourish extending to the right.

Colin Barry
Electoral Commissioner

27 October 2008