

APPENDIX 2 - Action plan for implementing review recommendations

Action log owner & Author: Martha Matheou, Head of Electoral Services
Sutton

CEO - Chief Executive Officer
RO - Returning Officer
DRO - Deputy Returning Officer
HoES - Head of Electoral Services
EC - Electoral Commission

V1 updated & reviewed: 21 September 2023

Review Recommendations		Review Recommendations - Good practice	Progress since May 2022	Due Date	On Track	Notes/Actions
1 Structured and Effective Project Planning						
1.1	To deliver a significant project the planning must be structured and enable those directly affected to understand what is required of them.	- If necessary, separate project plans for each area should be drafted if the requirements need to be more specific or technical. - Note that the team that also undertakes other functions reduces capacity. This also needs to be part of the review.	Tasks have been separated and delegated to relevant work streams. Elections project plans are in place for GLA 2024 elections and have been circulated to all established groups and workstreams. Engagement and Communications plan established. Within the established groups and projects plans consideration has been made for a full-time qualified team that acts together in order to establish a cohesive, experienced, and appropriately trained team (recommendation 14.2.6 of report) to accommodate requirements of the Elections Act 2022 and legislative changes to Electoral Services.	Ongoing	<input checked="" type="checkbox"/>	Appropriate contingency planning to be built in to consider staffing, venue etc and related scenarios. Electoral Services business as usual plans to include Election Bill processes and an assessment of training needs for core staff and contact centre. Assessment of resources needed due to the new burdens that the Bill will introduce between now and May 2024. Engagement & Communications Plan - liaise with Head of Communications to produce forward plan between now and May 2024. All project groups should consist of all those stakeholders who will contribute to the delivery of the polls with structured diarised meeting schedules. This schedule is then repeated at every meeting with new items or concerns raised at the time so that they are recorded, and the meetings then held more frequently in the run up to polling day.

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1.2	Establish a formal auditable process for election planning, with structured minutes, delegated tasks, and accountability if deadlines are not met.	- Aim attendance at a senior level initially, permitting delegation later. - Require responsible officers to attend project meetings. - Revisit action points at the start of every meeting to ensure that tasks have not slipped and delivery is not at risk.	The Returning Officer Group (ROG) was established in June 2023. Election planning has been split as follows: The Returning Officers Group (ROG), The ROG is chaired by the RO and includes 3 Corporate Directors, and two Directors. Elections Operations Group (EOG) (see 1.3 below) made up of 21 work streams; each work stream has a lead officer who is responsible for the management, delivery and progress of that work stream. Work stream leads report back to the EOG (item 1.3 below) and if necessary issues are escalated up to ROG if deadlines are not met or other issues arise via the Chair of EOG.	Ongoing	<input checked="" type="checkbox"/>	Meets monthly - agenda, minutes and action points held in a shared folder and distributed prior to meetings. Agendas and action logs to be updated and distributed prior to meetings. All meetings to reflect and achieve the agreed Terms of Reference. Attendees from other work streams or organisations to be invited as and when required.
1.3	Establish an election planning project group consisting of all stakeholders who contribute to the delivery of the polls with a structured diarised meeting schedule predetermined at least 6 months before polling day.	- Revisit action points at the start of every meeting to ensure that tasks have not slipped and delivery is not at risk. - Formally record action points not delivered to time and direct the officers responsible to complete them. - Schedule project group meetings to meet monthly for the first 2 months, then fortnightly in the 3rd and 4th months; and weekly in the final 2 months. - Where necessary, develop separate project plans for each area if requirements are more specific or technical.	The Elections Operations Group (EOG) was established in June 2023. They meet monthly with standard agendas, meetings are minuted and action logs are kept. The election delivery plan has been split into 21 work streams. Each work stream has a lead who is responsible for the delivery of the work for that work stream. EOG is a mix of Directors, HoES and others involved in delivery of each task. Work stream leads report back to the EOG and if necessary issues are escalated to the ROG if deadlines are not met or other issues arise	Ongoing	<input checked="" type="checkbox"/>	Meets monthly - agenda, minutes and action points held in a shared folder and distributed prior to meetings. Agendas and action logs to be updated and distributed prior to meetings. All meetings to reflect and achieve the agreed Terms of Reference. Attendees from other work streams or organisations to be invited as and when required. Action: Schedule of frequency of meetings to be discussed at the October meeting of ROG, to allow tasks to be completed. Currently monthly.

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1.4	Formally minute every meeting, check the minutes for accuracy and then distribute them to the stakeholders.	- Use a structured agenda to enable responsible officers to prepare in advance; make a record if no update is provided. - Invite other people, such as the police and the Electoral Commission, to attend a project meeting to give updates as necessary.	21 separate work stream work plans created which are on the Verto project management. ROG and EOG agendas are structured with a clear delegation of tasks and input. Actions are logged, updated and revised during each meeting. Standard agendas are circulated in advance. Highlight reports from Verto project management system, that workstream leads update prior to meetings.	Ongoing	<input checked="" type="checkbox"/>	Require responsible officers to attend project meetings. Officers asked to send deputies where they are unable to attend. All agenda items to be covered and discussed in all meetings. Delegated Officers must be able to report task as required. Verto Project Management System - to be updated and current at all times
1.5	The meeting schedule should provide for contingency planning with regard to scenarios relating to staffing, venue and other matters.	- Where necessary, facilitate more detailed discussion on a specific agenda item in a timely manner.	Elections Project Plan updated and circulated. Risk Register Register is updated and is in constant review to ensure it reflects changes via action plans. Business Contingency plan in place.	1 March 2024	<input checked="" type="checkbox"/>	Risk assessments & Business Contingency docs to be referred to if plan B arises - view/access to these available by all leads - leads to establish and understand contingency planning within their own lead areas - these should be written and distributed to the core Election Management Team for approval RO/HOEs
2 Organisational Structure of the Core Elections Team						
2.1	Review the structure of the electoral services team, the range of its functions, its capacity and qualifications, in the light of the requirements of the Elections Act 2022 and significant polls scheduled in London for 2024, a potential General Election, by-elections and a possible combination.	- With the introduction of the Elections Act 2022, concerns have been raised directly to Government by the Association of Electoral Administrators and the Electoral Commission detailing what will be significant challenges to Electoral Registration Officers and Returning Officers in the very near future.	Review is underway - peer review and report to be produced by LB Sutton HoES	1 Dec 2023	<input checked="" type="checkbox"/>	Project Plan for restructure in place. Timelines TBC Ensure recommendations in 2.2 below are considered during restructure processes. Elections Act burdens to core team are known and a training and development plan has been put in place, wider engagement and training will be offered where necessary to other Council services and Members.

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2.2	Recruit permanent staff to posts currently covered by temporary staff, encouraging applications from candidates with relevant training, qualification and experience.		<p>Recommendation noted - Action Lead comments below:</p> <p>Croydon did not have temporary staff filling permanent posts for 2022 elections. Holding the AEA certificate/diploma is an advantage for core staff if they wish to advance within the Management of Electoral Services as a profession. Training and ability are evaluated through performance appraisals. Candidates and core staff will be evaluated on their knowledge and ability to do the job. Experience and training must be considered and an acknowledgement that skilled workers hold as much value and those staff with qualifications.</p>	Ongoing	In progress	<p>Ensure core team have clear understanding of legislation.</p> <p>Encourage staff to participate in professional association, attend all AEA courses that will help and train them to understand their role.</p> <p>Ensure that through the appraisal process and regular 1-1 training and development needs are discussed and actioned as required.</p> <p>This has been rated as Ongoing as cannot predict absences and cover needed due to the Elections Act 2022 new burdens.</p>
2.3	Ensure staff, whether interim, locum or permanent, have a clear understanding of their roles and responsibilities, and the standards set and expected of them, and adhere to them.		<p>This has always been achieved through the following:</p> <p>Already in place and will continue and develop; In-house and Commissioned Training, Process notes and instructions, job specifications and evaluations, appraisals and regular 1-1s.</p>	Ongoing	✓	<p>Ensure staff help manage any learning required and understand any new processes and tasks.</p> <p>Team meetings: Agenda to include Training & Development</p> <p>Update all role requirements for elections and registration on a regular basis.</p>
3 Training of Staff						
3.1	Commission training for Count Supervisors that is comprehensive and reflects the arrangements for the verification and count in Croydon.		<p>Recommendation noted - Action Lead comments below:</p> <p>There was a misunderstanding in the report regarding the training provided to count supervisors and the staff entering information into the Xpress count module. The count training to supervisors was comprehensive and reflected the arrangements for the verification and count in Croydon.</p> <p>The Election staff training strategy which includes training for count supervisors by Head of Electoral Services</p>	1 March 2024	✓	Internal Training via HoES

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3.2	If Croydon continue to count by Ward this would mean training a core team of approximately 30 staff who the RO can turn to on every occasion. Training should cover the verification, counting methods, grass skirts, counting sheets, doubtful ballot papers and the roles of the agents entitled to observe.		<p>Recommendation noted - Action Lead comments below:</p> <p>The recommendation regarding 30 staff to report back to the RO would complicate the supervision process. It is important to train Senior Count Supervisors and allocate teams to each Senior Count Supervisor Lead. This will allow the Count Supervisors to concentrate on the task at hand and Senior Count Supervisor Leads to help manage and troubleshoot issues or questions. (Croydon currently operate with this separation of duties.)</p> <p>The training requirements listed are accepted and agreed and have been added to training plans.</p>	1 Feb 2024	☑	<p>Senior Count Supervisor Leads to be appointed early and be invited to Mock Count and Count Supervisor training.</p> <p>Count training documents should include all paperwork that relates to the appointed task.</p> <p>Senior Count Supervisor Leads should have a complete overview of the process for the purposes of succession planning to enable them to make decisions and escalate issues with confidence. All must have an understanding of the process and an agile attitude to resolve minor issues.</p>
3.3	Train 30 count supervisors comprehensively in conducting counts and empower them to identify staff who can act as counting assistants with in their own teams.	- Training should cover verification, counting methods, grass skirts, counting sheets, doubtful ballot papers and the roles of the agents entitled to observe.	<p>Croydon meets the current recommendation regarding training count supervisors.</p> <p>Asking them to identify count assistants will be incorporated into the recruitment strategy</p>	1 March 2024	In progress	<p>Training is designed and written with the election requirements in mind.</p> <p>Cater training for each election i.e grass skirts to only be included for Local Elections (next 2026).</p> <p>Training notes also include floor plans and logistics and so is adapted to suit venue.</p>
3.4	When recruiting election staff, give priority to trained and accredited staff.		<p>Recommendation noted - Action Lead comments below:</p> <p>Whilst this will always be a consideration in the recruitment process a mix of new and experienced is key for succession planning. In terms of accreditation this relates to an online training certification. The vital element is that during the 'in-person' training' key staff give confidence in their abilities to perform and follow the set process required of them. Count Supervisors will support counters, whilst Lead Count Supervisors will support Count Supervisors this separation of management at the count.</p>	1 Feb 2024	☑	<p>Ensure all staff understand the structure and their roles accountabilities.</p> <p>Require Count Supervisors to inform and direct count staff before the start of the verification and count process. If issues arise for Supervisors to take action and recall/repeat instructions where necessary.</p> <p>Timesheets for staff to include a notes column for supervisors to indicate capabilities of their count staff or recommend staff be considered for a supervisory position as they are best placed to assess competency of their team.</p>

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3.5	Train staff responsible for the top table data in verification, counting methods, grass skirts, counting sheets, doubtful ballot papers and the roles of the agents entitled to observe, so they understand the whole count process.	Consider recruiting accountants and/or elections team officers for this task.	Croydon meets the current recommendation. Plans will be updated and circulated during appointments.	1 March 2024	<input checked="" type="checkbox"/>	All top table responsible for data to be included in training. Copies of verification tally, spreadsheet, verification and count sheets to be given to team during training. Head of top table to receive tally and sense check formulas and ensure fit for purpose for the count ahead of verification day.
4 Decision on a Count Venue						
4.1	Decide on the count venue at least 6 months before a scheduled poll.		Decision for May 2024 made 12 months in advance and Fairfield Halls booked.	1 April 2023	<input checked="" type="checkbox"/>	
4.2	Establish clear responsibility for logistics / events management around and associated with the count venue to support delivery of the election. This should not be the elections core team.	- Unscheduled polls are of course difficult to predict but all preparations, staffing appointments and planning hinge on knowing what venue will be used.	Think Events have been engaged to manage the logistics and the management of the venue. Separate workstream and project plans are in place for this recommendation. Consideration is being made regarding May 2024: Scheduled GLA Count combined with snap GE: 4 ballot papers which means 4 separate counts; Parliamentary, London Mayor, Constituency and Assembly (Parliamentary must be counted and announced first). Stand alone GLA count - this will be a manual count (for the first time as traditionally GLA has been an electronic count); 3 ballot papers which means 3 separate counts; London Mayor, Constituency and Assembly	1 Dec 2023	In progress	Floor layouts and 'what to expect at the count' to be circulated to invited candidates, agents and guests. Good working relationship needed with Think Events and Head of Electoral Services - all issues to be reported and resolved for the final plan to be put in place. Walk through and mock scenarios to be considered and added to the Risk Register. Logistics of 4 boxes per station must be accommodated within plans = 520 boxes for Croydon.

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4.3	Formalise the booking with a written contract that is scrutinised by Legal Services and the core project team and signed off by the Returning Officer.	Contract will: Serve as a record of commitment for both parties; prevent conflict and mitigate risk; ensure compliance; serve as a collaborative and communication tool that can be referred to; set out the terms and conditions of hire; and be proof of what each party has mutually agreed.	Customer Order Form and Terms and Conditions for booking has been signed and reviewed by the Interim Director of Commercial Investment & Capital and Interim Director of Culture and Community Safety.	1 July 2023	<input checked="" type="checkbox"/>	The contract is kept under review as plans and logistics are progressed the contract might/must be able to adapt and evolve to the satisfaction of both parties.
5 Planning for the Count						
5.1	Ensure the plan for the Count details preparations for the front reception area		Specific work stream for this. Count plan will incorporate, venue, reception, count process, staffing and guests.	1 Feb 2024	In progress	covered - see 4.2 above
5.2	Appoint a separate count manager, directly responsible to the Head of Service and with the appropriate authority, to report to the project group on the preparations for the Count. Ensure everyone is told the count manager's name.		Think Events engaged and a working plan and relationship has been established.	1 July 2023	<input checked="" type="checkbox"/>	covered - see 4.2 above
5.3	The responsibilities of the count manager should be clear, focussing on the set up for the Count and issues relating to the venue, and understood as distinct from those of the Deputy Returning Officers and the team who run the Count	- This would also free up the Head of Service and the core team to run the count.	Draft requirements and duties to be agreed. Once logistics and needs are finalised a separation and delegation of duties and functions will be established i.e reception, ballot box drop off, ballot boxes placed ready for each count team etc. Plans have incorporated that the running of the Verification and Count is separated from the venue logistics and set up.	1 Dec 2023	In progress	Clear requirements and ownership of tasks. Single point of contact that can deal with venue issues and logistics that is not the Head of Electoral Services. Issues that arise regarding the venue to be dealt with by Think Events. Think Events to have a clear understanding how their
6 Attendance at the Count						
6.1	Inform counting agents of the statutory deadline for applying to attend the Count (five working days before polling day).		This is a statutory requirement.	25 April 2024	<input checked="" type="checkbox"/>	

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6.2	Inform other observers, guests and members of the media of the deadline for applying to attend the Count, which will be the same as the statutory deadline (five working days before polling day).		This is a statutory requirement. Communications team deal with all media accreditation and send invites to media that request to attend Croydon counts.	25 April 2024	✓	Ensure Communication teams send updated media list for reception to admit and are available support media representatives.
6.3	Post tickets/authorisations to attendees by 1st class on the Friday before polling day	- 3 working days before polling day.	Recommendation noted - Action Lead comments below: Croydon to determine what works best for them given that posting might take longer than 3 working days. Use of email to invite is a quicker and more direct source of engagement.	29 April 2024	✓	HoES to determine best way to make contact and to include how in final project plan. HoES to relay how invites will be sent to candidates and agents.
6.4	Brief candidates and agents on arrangements for applying to attend the Count, including discretionary consideration by the RO of late applications to replace election agents due to illness or other exceptional circumstance.	- 2 months before polling day. - These arrangements should be briefed including the restrictions and systemic approach to the Candidates and Agents at one of the briefings.	Recommendation noted - Action Lead comments below: This is a statutory requirement. It is sensible that HoES briefs candidates and agents after the close of nominations as this is the time that candidates and agents will be known. Croydon HoES has traditionally briefed candidates and agents separately regarding the count. This is an established good practice and should continue as a sensible approach which allows candidates and agents to raise specific questions regarding the count direct with HoES to consider and answer.	2-5 May 2024	✓	HoES to continue to hold separate briefing with candidates and agents regarding the count. Floor layouts and 'what to expect at the count' to be circulated to candidates and agents with briefing agenda.
7	Systematic Approach to Managing Access to the Count					
7.1	Review the recording of who is entitled to be in each stage of the counts and establish a detailed and robust entry system.	- Options include a photograph or wristband barcode entry system that records the person entering and leaving the venue, ensuring an audit of who is in the building, and the use of profession venue management services.	Recommendation noted - Action Lead comments below: This needs to be efficient and proportionate to the logistical requirements of the venue. Entry arrangements TBC once final count logistics are in place.	1 April 2024	✓	

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7.2	Share details of arrangements for managing access to the count with the political parties.		Recommendation noted - Action Lead comments below: This is always achieved through the candidates and election agents. Invites include all arrangements as required.	29 April 2024	<input checked="" type="checkbox"/>	covered - see 6.4 above
7.3	Brief candidates and agents on arrangements for managing access to the count, including the restrictions and systemic approach.	2 months before polling day	covered - see 6.4 above	29 April 2024	<input checked="" type="checkbox"/>	
8 The Reception Arrangements at the Count						
8.1	Organise the reception area to filter the categories of people attending the venue: (a) Staff (b) Candidates (c) Election Agents (d) Counting Agents (e) Media (f) Guests		covered - see 5.1	1 April 2024	In progress	
8.2	Give priority to candidates and agents to ensure they can gain access before the verification and counts.		Recommendation noted - Action Lead comments below: Phased arrival times would support this recommendation. Prioritising would involve cutting in line and could lead to other issues.	29 April 2024	In progress	Phased arrival times to be added to invites. 29th April 2024 is the last date candidates and agents confirm attendance.
9 Staffing at the Count						

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9.1	Update records of all staff on Civica software (MEA) and confirm their right to work in the UK prior to polling day	1 month before polling day	Recommendation noted - Action Lead comments below: Right to work checks are made before staff appointments, this includes reserve staff and bank staff. This recommendation relates to last minute staff employment; drop outs, illness etc. last minute appointments will be required. The Right to work documentation is needed prior to working and so flexibility is required. Core Electoral Services will take the lead and process as necessary.	Ongoing	☑	Core staff to understand the Right to Work rules and what is required.
9.2	Restrict appointments to staff who have provided the necessary information		covered - see 9.1 above	Ongoing	☑	Required by law.
9.3	Send out appointment letters / tickets prior to attending the venue and check them on arrival	- 1 month before polling day	covered - see 5.1 and 8.1 above This is scheduled for mid-March once known if the elections will be combined.	8 March 2024	In progress	
9.4	Check whether core staff held on the database have worked on counts before in advance of polling day	- 1 month before polling day	Recommendation noted - Action Lead comments below: Unfortunately Election Teams do not have a core counting team available. Recruitment and appointments are made by staff on the elections staffing database. Counters with experience are always appointed where appropriate, there will always be a shortfall. Our planning and teams allocation considers mixing experienced counters with first time counters to help support the process on the night.	Ongoing	☑	Ensure a mix of experience and new within teams.
9.5	Prepare contingency plan to ensure sufficient trained staff attend the count		covered - see 1.5 and 9.4 above	Ongoing	In progress	
10	An Effective Escalation Procedure					

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10.1	<p>Establish a formal process for raising and addressing concerns so that:</p> <p>the Returning Officer knows that matters that should be escalated to her are done in a timely fashion for decisions to be made;</p> <p>the staff understand this and have an agreed process to follow; and</p> <p>such matters are then resolved in a timely fashion, recorded and any outstanding identified and dealt with as a matter of priority.</p>		<p>Training /briefing session for count supervisors, senior count staff (Senior Supervisors / DRO/ CRO and others scheduled to ensure that escalation and communication procedures are understood in advance.</p> <p>Clear delegation in duties and structure chart aided on the night by name badges with titles - so staff know who is responsible for each tasks.</p>	Ongoing	In progress	<p>covered - see 3.2 above</p> <p>Name badges for key staff.</p> <p>Venue stand alone risk assessment to be completed and signed off by Croydon Health & Safety team.</p>
11	Length of Time taken to Undertake the Count					
11.1	<p>Review and address aspects that contributed to the time taken.</p>	<ul style="list-style-type: none"> - The efficiency of the IT (Wi-Fi and equipment) - PA system not operating as expected - Double depth tables provided 	<p>Recommendation noted - Action Lead comments below:</p> <p>In 2022 there was no Wi-Fi. The issue related to Windows interacting with Xpress (Election Management system (EMS)) and the production of the results.</p> <p>There will be IT requirements for the coordination and reporting of results for the GLA - arrangements TBC.</p>	Ongoing	<input checked="" type="checkbox"/>	<p>Planning and reviewing of potential venues has been on basis of double depth tables.</p> <p>Interaction between windows & EMS has been addressed and fixed - tests will be made prior to the Count day.</p> <p>ICT requirements at the count is a project workstream with its own action plan that is monitored and should be tested and signed off by HoES and ICT.</p> <p>GLRO directive regarding ICT and reporting results to be added to the plan once known and tested.</p>

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11.2	Opening of receipted postal votes on polling day (Office receipts, polling stations and the sweep)		<p>This was resourced to the level needed in 2022.</p> <p>Each election brings different issues and criteria – opening of postal votes will be resourced differently for GLA with the following considerations:</p> <p>dependant on whether stand alone GLA or combined; consideration to the new requirements concerning handing in postal votes (as required by Election Act 2022); interface between ERO portal (online absent vote application) and Xpress (EMS) (as required by Election Act 2022).</p>	29 April 2024	In progress	<p>ICT plans and testing for opening sessions.</p> <p>Opening of postal votes processing notes updated.</p> <p>Opening of postal votes staff recruitment and training notes to be updated.</p> <p>Electoral Services business as usual plans to include Election Bill processes and an assessment of training needs for core staff and contact centre. Assessment of resources needed due to the new burdens that the Bill will introduce between now and May 2024 - see 1.1 above.</p>
11.3	Agreed and monitored timings for the preparation and commencement of the count venue		<p>Fairfield Halls available from 8am on 2 May so far more time available. Agreed time for completion of set-up to be agreed with Count Manager.</p> <p>covered - see 4.3 above</p>	1 May 2024	In progress	
11.4	Accountability to ensure that expectation of completed delegated tasks are met	<ul style="list-style-type: none"> - Communication between Count Supervisors, DROs and the top tables - Process of dealing with doubtful papers - Training and accreditation of a core count supervisor team, including those working on the data collection top tables 	<p>Senior Managers asked to volunteer or/and find capable staff within their service - have been contacted via email.</p> <p>covered - see 10.1 above</p>	Ongoing	In progress	<p>Electoral Commission table templates for each count team</p> <p>Electoral Commission Guidance 'dealing with doubtful papers' to be circulated with DRO appointments</p>

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11.5	Understanding of the verification and count tolerances		<p>For 2024 GLA Elections this is likely to be directed by the Greater London Returning Officer.</p> <p>(Constituency) Returning Officer and Head of Electoral Services attend meetings hosted by LondonElects (City Hall) regarding the GLA requirements.</p> <p>The RO for all other verifications & counts agrees & sets tolerances through ROG and the Count management planning.</p>	29 April 2024	In progress	<p>Liaise with London Elects and update project plans and objectives once information has been agreed and confirmed.</p> <p>Ensure Returning Officer Assistants and top table officers understand tolerances and the line of escalation if issues occur.</p> <p>For all elections other than GLA: Tolerances to be communicated to agents and candidates where they differ from verification results and the final count results; this is to ensure transparency in differences before any declarations.</p>