3

Workforce management, accountability and corporate structure

3.1   Election delivery relies on many thousands of people—over 70 000 at the 2013 election. A key element in being able to deliver a lawful and successful election is the capability, knowledge, training and successful recruitment and retention of staff, both permanent and temporary.

3.2   The Australian Electoral Commission (AEC) has acknowledged that in many cases the things that went wrong during the 2013 election were caused directly or indirectly by variations or anomalies in staff capability, understanding or management.

3.3   While it needs to be recognised that human error will occur with an undertaking as large and complex as a federal election, systems should be in place to rapidly identify and rectify errors. It also needs to be made clear to staff that full accountability is required when the sanctity of Australia's democratic process is at stake.

3.4   The 2013 election showed that these systems were not in place in some AEC operations, leading to major failures. The 2013 election also demonstrated that where systems were in place, on some occasions they were either not used, not enforced or were deviated from, as is evidenced by the ballot paper handling errors that occurred in a number of states.

3.5   The AEC is now in the middle of a necessary and crucial reform agenda. Arguably, without the failings of the 2013 election, the AEC would not be facing this necessary reform.

3.6   Prior to the 2013 election, the AEC workforce stood at under 1 000 permanent staff. For the 2013 election, the workforce increased by a reported total of 73 507 temporary staff.[1] Such a rapid increase is always going to put a strain on the organisation and its capacity to manage such a

---

1   Australian Electoral Commission (AEC), *Submission 20.3*, p. 118.

large workforce. The AEC is fortunate, however, in that it has a very loyal, long-term workforce, both in its permanent staff and returning election day staff.

3.7   While this means that the AEC has a strong reserve of experience, it can also lead to a situation where some staff are reluctant to observe changes in national policies because they feel they 'know how the job is done'. This attitude can also affect the AEC's overall corporate identity and the quality of its work.

3.8   It is essential that, to make the transition to this large workforce as seamless as possible, nationally consistent policies and procedures, in line with the *Commonwealth Electoral Act 1918* (the Electoral Act), are not only in place but are adhered to.

3.9   These policies and procedures need to be based on the requirements of the law, and deliver consistent outcomes, with little deviation unless where absolutely necessary.

3.10   In order to deliver these consistent outcomes, some elements of individual state-level election planning and control need to be revised, with more national oversight and approval to ensure consistency and to ensure that any local deviation is strictly necessary. This will be best achieved by analysing and correcting structural and corporate culture and identity issues within the AEC.

3.11   A fundamental area for reform in the organisation is the role and independence of the state managers and the confusion this generates within the national electoral authority.

3.12   This Chapter focusses on the elements of change needed within AEC staffing and structure, accountability and training—both for election delivery and for the longer-term viability of the AEC as a capable, independent and stand-alone agency—as well as on the need for management of performance, culture and corporate identity.

Organisational structure and staffing

3.13   The AEC organisational structure is a relatively flat and top-heavy organisation. It has been observed in the past that the AEC, and its traditional divisional office structure, lends itself to a somewhat stagnant workforce, with little career progression and difficulty in establishing clear lines of accountability. As far back as 1974, the 'Scott Report' review of the

AEC's structure identified issues with the structure and nature of the AEC.[2]

3.14   Indeed, many of the challenges identified in the Scott Report as restricting the development and/or effectiveness of the Australian Electoral Office (the AEC's predecessor) are still a feature of the operational landscape for the AEC:

- resourcing constraints and the pressures of election delivery in a compressed timeframe;

- short and long-term planning needed to enable effective delivery of service and flexibility in responding to change in the ways elections are delivered;

- adherence to standardised policies, procedures, training and aids for staff;

- embracing technology for ongoing roll-maintenance activity (though the AEC has achieved this to some degree);

- logistics around supply and delivery of election materials; and

- civics education to foster an aware and engaged voting public.[3]

3.15   These issues are evident even today; and while some, such as short timeframes, will always be a feature of elections, the fact that others—such as adherence to national policies and logistics management—are still issues 40 years after the Scott Report was published is of serious concern, and contributory to the events of the 2013 federal election.

Permanent staff

3.16   The AEC had 847 ongoing staff as at 30 June 2013 (reflective of approximate staff for the 2013 election).[4] Of these staff, 563 (or some 66 per cent) were not located in national office in the ACT, and so could be considered to be mostly front-line service delivery staff, either in state offices, larger work units (where multiple divisional offices are co-located), or individual divisional offices.

3.17   The makeup of total staff, according to their substantive Australian Public Service (APS) classification, indicates that the 'flat' structure identified historically still exists. Half of all national office staff are within the 'middle management' bracket (see Table 3.1).

---

2   WD Scott & Co Pty Ltd, *Review of the Structure, Systems & Facilities, of the Australian Electoral Office*, 1974, p. 3-5.

3   WD Scott & Co Pty Ltd, *Review of the Structure, Systems & Facilities, of the Australian Electoral Office*, 1974, pp. 2-1 – 2-2.

4   AEC, *Annual Report 2012-13*, pp. 103-106.

Table 3.1   Permanent middle-management staff of the Australian Electoral Commission

AEC Ongoing Staff	Executive Level 1	APS 6	Total Ongoing Staff (all levels)	Percentage of total (EL1 & APS6)
National Office	83	60	284	50.3%
State Offices and Divisional Offices	31	151	563	26.8%
Total	**114**	**211**	**847**	**N/A**

Source   Australian Electoral Commission, Annual Report 2012-13, pp. 103-106.

3.18   The risks associated with having so many middle-management staff can play out in the overall capability of an agency. The Boston Consulting Group has noted that:

> Despite the pivotal and difficult role middle managers play, they often get lost in the shuffle and receive insufficient development, support, and attention from senior leadership.[5]

3.19   The majority of staff in divisional offices are employed at the APS 6 level or below and are responsible for the frontline processing of enrolment and roll management functions and preparing for, delivering and evaluating, elections within their Division and/or state.[6]

3.20   The AEC has traditionally had a long-serving, stable and dedicated workforce, with many regional officers and specialists within its national, state and divisional offices spending a majority of their careers with the organisation.

3.21   While this enables some staff to build extensive knowledge and experience in electoral processes within Australia, it also creates a situation where organisational capability and knowledge is invested in these individuals and can lead to their being relied upon for the delivery of elections or the development of tools, such as election IT systems.

3.22   Having specialised, long-serving staff can also mean that senior staff have often been with the agency for a long period of time and have become comfortable in their role. Such staff may not necessarily look for innovation or desirable change in work practices.

3.23   The potential for over-reliance on long-serving specialised staff is highlighted by the AEC's use of 'alumni' staff at election events. While the usage of retired employees to aid in delivery of elections does allow for the effective transfer of experience and skill, it also highlights a lack of

---

5   Boston Consulting Group, *High-Performance Organizations: The Secrets of Their Success*, September 2011, accessed 10 November 2014, <bcg.com/documents/file84953.pdf>, p. 6.

6   A more detailed breakdown of all AEC staff from the 2012-13 financial year can be found at pp. 103-09 of the Australian Electoral Commission, *Annual Report 2012-13*.

capability and capacity-building in existing staff or a lack of willingness to train existing staff in between elections to perform these tasks.[7]

3.24 Discussions with state managers as part of this inquiry, during both public hearings and site visits,[8] also provided evidence of a disparity in practices amongst the states and territories, with some state managers demonstrating very good initiatives, but others demonstrating a certain laxity in how they performed their core election-delivery role (including staff management) and the nature of their individual accountability for election outcomes.

3.25 This differentiation, both in capability and practice, at the most senior levels in the state offices of the AEC suggests that reform within those levels (and below) is overdue.

3.26 Staff capability, and the development of staff, are aspects of permanent AEC staff management that also concern the Committee, and these are discussed later in this chapter. However, of particular concern is the capability, management and accountability invested in senior state management and statutorily appointed roles and the resultant cultural issues identified by the Keelty Report.

Australian Electoral Officers

3.27 Australian Electoral Officers (AEOs) are appointed under section 20 of the Electoral Act to undertake the following activities:

- membership and conduct of the Redistribution Committee and redistribution notices and objections — Part IV;

- issuing of certificates of incorrect enrolment to the Electoral Commissioner — section 106;

- delegated decisions on enrolment and objection — Part VIII and IX;

- receiving Senate election writs — section 153;

- nomination of candidates duties, such as receipt of deposits, declaration of nominations, receipt of group voting tickets and ballot draws — Part XIV;

- investigation of prematurely opened ballot-boxes — section 238B;

- duties relevant to Antarctic voting — Part XVII;

- determining by lot where a split ballot paper decision between multiple group voting tickets must be allocated to — section 272;

---

7   AEC, *Submission 20.6*, p. 22.

8   See Transcripts of Evidence of hearings from 12 March 2014, 15 April 2014, 16 April 2014, 8 May 2014, 11 June 2014 & 12 November 2014.

- scrutiny determinations for Senate elections, including casting the deciding vote if needed and receiving, parcelling and retaining ballot papers—section 273;[9]

- the AEO has the ultimate responsibility for computerised scrutiny of Senate votes—section 273A;

- other vote and declaration decisions—Part XVIII;

- decide to grant a Senate recount—section 278;

- final determination on contested ballot papers—section 279B;

- return of Senate writs—section 283;

- custody of ballot papers—section 393A; and

- other minor approval, receipt, communication and declaration activities.

3.28   Currently, each AEC state manager is appointed as the AEO for their state.[10] This statutory appointment, coupled with the public service position of AEC state managers, constitutes an awkward conflation of roles.

3.29   AEO appointments are currently made by the Governor-General, typically for a period of five years, and this reflects an appropriate layer of separation for what should be an arms-length independent role within the electoral process. However, this also means that the Governor-General is required to terminate AEO appointments—further complicating the capacity of the Electoral Commissioner to hold accountable, or ultimately terminate, underperforming state managers.

3.30   As it stands, state managers are in one role public servants, responsible to the Electoral Commissioner, but are also appointed to a statutory role in a process that is theoretically external to the AEC's corporate structure and therefore not answerable to the Commissioner. This is a challenging conflict of roles for a single officer to hold and, in the Committee's view, arguably leads to an organisational culture which is detrimental to the delivery of elections.

3.31   This dual role structure could also be said to present issues with accountability within AEC business, especially where there is a failure of election delivery and questions arise over who is ultimately accountable— the state manager, the AEO, or the Electoral Commissioner.

---

9   Subsection 273(17) of the Electoral Act prescribes that an AEO shall not vote at a Senate election, other than to potentially cast the deciding vote if the final vacancy is tied between two remaining candidates.

10   Including the Northern Territory. The New South Wales State Manager acts as the AEO for the Australian Capital Territory.

3.32   Unlike a state manager, the AEO should not be answerable to the Electoral Commissioner, especially given the clear intention of an AEO's appointment under the Act as an equivalent 'electoral officer'. The statutory nature of the AEO role is very important, as that person has ultimate decision making power on admissibility of votes, conducts random lot draws during Senate counts, and can ultimately cast the deciding vote in a Senate election (as outlined above).

State managers

3.33   Each state and territory has an appointed state manager who manages the delivery of federal elections within their state. State managers are Senior Executive Service (SES) Level 1 or 2, who previously reported directly to the Electoral Commissioner, but who now, as of early 2015, report to the Deputy Electoral Commissioner and, as discussed above, also hold statutory positions as AEOs.

3.34   A copy of the current AEC organisational structure reflecting this has been included at Appendix C.

3.35   The state manager is a critical position within the AEC, responsible for frontline service delivery—the delivery of electoral activities in their respective jurisdictions. State managers are responsible for developing election delivery plans, managing state-level contracts and undertaking any other state-specific election or roll management activity. Essentially, they are a chief operating officer for election delivery in their state or territory.

3.36   The development of the AEC as an organisation, and the roles of state managers, has evolved in such a way that there is a high degree of independence and autonomy in state offices. This is evidenced by the organisation's reporting structure. The national programme managers at equivalent SES levels report either to a First Assistant Commissioner or the Deputy Electoral Commissioner, ensuring a consistent oversight and line of reporting for programme areas. The state managers, however, now report directly to the Deputy Electoral Commissioner, independent of the reporting structure through relevant First Assistant Commissioners. See Appendix C.

3.37   The fact that electoral Divisions are calculated according to and contained within existing state and territory populations and borders adds to this separation; but the geographically-focussed nature of AEC service delivery does not mean that there should be autonomous control of service delivery within those boundaries. Nor should state managers develop a satellite corporate identity beyond the main corporate structure.

3.38   The fact that the reporting line for state managers (as AEOs) sits outside
        the senior executives responsible for national policy and programme
        development increases the potential for unorthodox operations due to a
        lack of oversight, and can make it difficult for programme managers to
        implement nationally consistent procedures.

3.39   As evidenced by the 2013 federal election, the level of autonomy in state
        offices has led to a disparity in practices that places unnecessary risk on
        the process of election delivery. This is concerning, as there should be
        accountable oversight via the relevant national programme manager and
        First Assistant Commissioner through to the Electoral Commissioner.

3.40   Another agency similar to the AEC, in that it has service delivery
        obligations under tightly-defined legislative requirements, the Australian
        Customs and Border Protection Service, has a reporting structure that
        ensures that the senior executives with oversight responsibility for
        programme development are also responsible for programme delivery
        and state staff have a clear reporting line through these national
        managers.[11]

3.41   The divergence from programme direction that caused the events that
        occurred in WA during the 2013 election led the Keelty Report to
        recommend:

> The AEC consider bringing to the attention of the Joint Standing
> Committee on Electoral Matters the impact of the statutory
> appointments of AEC State Managers on the ability of the AEC
> Commissioner to achieve national uniformity of approach and
> consistency of approach in the conduct of Federal Elections.[12]

3.42   There are centralised policies and procedures established by the AEC, and
        there is little need, outside of exceptional operational need, for variation in
        delivery of AEC business. Yet, where there is a disconnect between stated
        programme directives and how circumstances should be responded to, or
        a silence in these directives on the assumption that the state office will
        respond accordingly under the autonomy of the state managers, this
        essential accountability and approval process cannot be relied upon.

3.43   The problematic level of autonomy possessed by state managers suggests
        a need for AEC state manager positions to undergo revision in regard to
        classification and organisational structure. Having some state managers at
        a higher SES level (level 2) than the national programme managers (SES

---

11   Australian Customs and Border Protection Service, *About Us*, accessed 21 October 2014,
     <customs.gov.au/site/page4222.asp>.

12   AEC, *Australian Electoral Commission Inquiry into the 2013 WA Senate Election*, Commonwealth
     of Australia, 2013, p. 30.

level 1), whose directions the state managers should be following or seeking approval from for variations, makes for a structure that may allow some state managers to view their position as senior to those who should be setting the work practices and standards they should be following.

3.44   During site visits and hearings conducted during the inquiry, the Committee became aware of a disparity in 'best' practices in the states and territories, with some state managers demonstrating or outlining very good initiatives, but others demonstrating a certain laxity in how they performed their core election-delivery role, including staff management and ultimate accountability for election outcomes. This evidence of differentiation, both in capability and practice, at the most senior levels in the state offices of the AEC further suggests that reform within those levels, and below, is overdue.

3.45   Overall, the situation of having senior staff in state offices having a high level of management autonomy, while also holding statutory positions, further challenges and undermines the ability for discipline and adherence to necessary standards to be upheld, and for accountability to flow properly to the AEC national office, national programme managers and, ultimately, the Electoral Commissioner.

Committee comment

Separation of roles

3.46   As outlined above, the Keelty Report identified that the current statutory appointment of AEOs can confuse the efficient and consistent delivery of federal elections. The Committee agrees, but feels that further change should be considered beyond the nature of the AEO appointment.

3.47   In the Committee's view there is a strong argument that the statutory role of the AEO should not rest with an AEC employee due to the confusion and conflict of roles this presents along with the associated accountability issues noted above.

3.48   The dual role of state manager/AEO unnecessarily complicates the picture of where responsibility and accountability lies and the statutory nature of the AEO appointment could also be said to reinforce the autonomy currently enjoyed by state managers and further legitimise any state-based departure from AEC policy and procedure. In order to create a clear separation in activity and accountability, the need to separate the roles of AEO and state manager/AEC employee appears clear.

3.49   In evidence to this inquiry, Mr Mick Keelty noted:

> I was surprised at the level of autonomy of a state manager. This is not about the person. I spent a lot of time with the state manager trying to get him to understand the import of what had happened. Where are we? We are in March. It was only mid-February that he stood down. I was surprised that he did not stand down much earlier, because in managerial accountability terms he had to take responsibility for this. There is a difference between responsibility and accountability. He was responsible for having all those regulations and all those plans in place. I think what it left the government, the committee or the parliament with is: what do you do with a non-performing state manager?[13]

3.50   The Committee envisages that the role of the AEO during an election, as set out in the Electoral Act, could be fulfilled by an adequately prepared, independently-appointed third party who would undertake the current election-time AEO duties and responsibilities.

3.51   Separation of the AEO/state manager positions would allow for the AEC state managers to hold wholly separate public service roles, and would clarify accountability within the applicable and appropriate APS rules and law.

3.52   This separation would also allow for the AEC national office to have more oversight and control over election preparation, planning and delivery, while keeping the essential statutory role of the AEO intact. This would complement the recent organisational changes the AEC have undertaken.

3.53   However, the Committee recognises that separation of the AEO/state manager roles would constitute a quantum shift, with significant implications for election delivery. Additionally, the Committee considers that the separation could not be feasibly implemented before the next federal election, as there would have to be a development period for the mechanisms required, identifying suitable candidates and any required legislative changes.

3.54   Accordingly, the Committee recommends that the Australian Government assess the suitability of, and analyse the requirements to accommodate, separation of the state manager and AEO roles.

---

13   Michael Keelty, *Transcript of Evidence,* 5 March 2014, Canberra, p. 11.

Recommendation 3

> **The Committee recommends that the Australian Government consider and assess the formal separation of the roles of state manager and Australian Electoral Officer involving:**
>
> - **the appointment of Australian Electoral Officers independent of the Australian Electoral Commission; and**
>
> - **the assigning of any non-election duties of Australian Electoral Officers to the Electoral Commissioner or other appropriate officer.**

State managers

3.55   The current practice of allowing state managers to plan and deliver an election within their state or territory is a reasonable election preparation measure on the part of the AEC. However, for that planning and delivery to apparently not have complete oversight and approval from the relevant programme managers, First Assistant Commissioner, and the Electoral Commissioner within AEC national office creates an unnecessary risk of deviation that the Committee believes is unacceptable. Plans should be based in the majority upon the clearly stated programme directions, policies and procedures created by the AEC national office.

3.56   In this same context, the Committee acknowledges that there are bound to be state and even Division-specific logistical differences in election delivery.[14] But variations resulting from an arbitrary departure from national programme direction without a solid logistical reason are not acceptable. Again, the current power invested in AEC state managers to plan, conduct and evaluate election delivery with apparent minimal central oversight and control is an unacceptable latitude in relation to the delivery of a nationwide event underpinning the Australian democratic process.

3.57   In April 2015 the AEC implemented organisational reforms (advised in correspondence of late March 2015).[15] These reforms include the welcome move of refocusing the role of the Deputy Electoral Commissioner into a more strategic operational manager (akin to a Chief Operating Officer). Another element, as reflected in the current organisational chart, is the direct reporting of state managers to the Deputy Electoral Commissioner, which, in conjunction with the refocusing of the Deputy Electoral

---

14   Sandra Riordan, Tasmania State Manager, AEC, *Transcript of evidence*, 16 April 2014, Hobart, p. 3.

15   Correspondence to the Committee from the AEC dated 30 March 2015.

Commissioner's role, will allow the Deputy Electoral Commissioner to manage the core of AEC service delivery business while leaving the Electoral Commissioner free to focus on greater oversight on programme deliverables and AEC business as a whole.

3.58   In addition, the new AEC organisational structure now has the 'core' election and roll management policy responsibilities channelling through two different First Assistant Commissioners. Until early 2015 one First Assistant Commissioner was responsible for both of these areas.

3.59   To take this reform further, the Committee is of the opinion that the senior executive status of the state managers needs to be wound back within the organisational structure of the AEC, with state managers not only reporting directly to the Deputy Electoral Commissioner for their position management, but with additional formalised reporting on programme management and approvals through the First Assistant Commissioners responsible for the elections and roll management programmes that the state managers deliver in their states and territories. It would also make sense that state managers sit at the same executive level as the other programme managers.

3.60   This would allow for full oversight, approval and accountability reporting mechanisms to be in place over what should essentially be a state coordinator of centrally-dictated AEC business within those defined programmes.

3.61   Having state managers at equal level (or possibly lower in smaller states/territories/organisational structures) would also normalise the management playing field and remove any distortion in regard to high-level authority over a programme directive.

3.62   In tandem with these reforms, the Committee believes that clear performance expectations should be set for state managers, with appropriate triggers for disciplinary and termination actions.

3.63   The delayed resignation of Mr Kramer after the WA Senate election problems, as well as the poor practice and awareness shown by the South Australian State Manager (as outlined in Chapter 2) raises concerns that these expectations and triggers do not currently exist, or are not adequately embedded or enforced in the AEC management structure.

3.64   These matters need to be rectified as a priority. The Committee strongly urges the government to consider implementing Recommendation 4 before the next federal election.

Recommendation 4

> **The Committee recommends that the Australian Electoral Commission formalise all state manager positions to report on all election and roll management programme deliverables directly to the First Assistant Commissioners responsible for election and roll management programme business in order to ensure consistency and accountability.**
>
> **The Committee also recommends that all existing state managers be assessed for continued suitability in their positions, with new contracts to be drawn up with clear performance expectations and disciplinary and termination triggers stipulated as terms of employment.**

Divisional Returning Officers

3.65   Divisional Returning Officers (DROs) are appointed under section 32 of the Act:

> There shall be a Divisional Returning Officer for each Division, who shall be charged with the duty of giving effect to this Act within or for the Division subject to the directions of the Electoral Commissioner and the Australian Electoral Officer for the State.

3.66   DROs have significant responsibility for the conduct of elections. The legislated responsibilities of a DRO include:

- management of a divisional office or the like representing every division;
- receiving nominations for House of Representatives candidates;
- declaring nominations;
- issuing and receiving postal votes (if not done centrally);
- issuing and managing pre-polling in their Division;
- managing any prematurely opened ballot-boxes;
- managing non-voter and multiple-voter investigations in their Division;
- undertaking scrutiny of votes in their Division;
- conducting recounts if required;
- declaring the poll; and
- maintaining safe custody of electoral documents (including ballot papers) after an election is conducted.

3.67   On a practical level, the DRO is responsible for conducting all levels of AEC business within their Division, ranging from roll management and elections through to electoral education.

3.68   Under the Electoral Act, there is to be one DRO for each electoral Division (currently 150). This situation had a clear historical basis where the DRO was responsible for continuous update and maintenance of electoral rolls (that were essentially bound to the Division) free from manipulation by either political parties or distortion due to maintenance of other electoral rolls.[16]

3.69   This individual role, maintained in most individual Divisions, would seem to be something of an anachronism in the modern context. The original argument that the DRO could maintain knowledge of the Division and its constituents is impossible with the current average size of a Division being over 90 000 people, and some Divisions being geographically vast—the Division of Durack, for example, is 1 587 758 square kilometres in size.[17]

3.70   The role of the DRO is also somewhat confused in the context of current AEC practice, whereby an employee is identified as a Divisional Office Manager, but undertakes the activities specified for a DRO outside of an election period before being appointed to the DRO position once an election is called. While this may facilitate the purely legislative role of the DRO, the shifting roles occupied by the individual concerned can make ongoing accountability and performance management difficult.

3.71   The AEC has also co-located a number of divisional offices into Larger Work Units (LWUs) over the previous two decades, where there are shared responsibilities among staff for those Divisions but also a requirement for a discrete DRO for each Division during election time. The Committee visited an LWU in Perth and Hobart and noted the professional benefits of co-locating DROs.

3.72   DROs have a very high level of responsibility for the on-the-ground delivery of elections. They are front-line decision-makers with a high degree of regional autonomy, responsible for employing, training and overseeing a large group of temporary employees to ensure the effective conduct of elections.

3.73   While historically this may have been practical for election delivery, it is evident from the events of the 2013 election that this regional autonomy has led to unacceptable regional anomalies, raising questions about the level of autonomy given to DROs.

---

16   P Brent, *Too many Kings: What's wrong with the AEC*, 2008, accessed 30 June 2014, <polsis.uq.edu.au/apsa2008/Refereed-papers/Brent.pdf>.

17   AEC website, *Profile of the electoral division of Durack (WA)*, accessed 7 October 2014, <aec.gov.au/profiles/wa/durack.htm>.

3.74   There also appears to be a lack of performance measurement and accountability for the conduct of DROs. Chapter 2 notes ballot paper handling issues and poor decisions made at the DRO level. In revealing these to the Committee, the AEC was not able to determine what, if any, performance sanctions were taken against DROs, or indeed what performance measures DROs were required to meet where the issue was clearly a failure to follow standard operating procedures. Performance measurement is discussed further below.

Polling period staff

Election period and election day staff

3.75   The increase in temporary staff for an election is a requirement that the AEC must manage at every election. The roles that are undertaken by these temporary staff are varied, but can be broken down into clear categories with clear lines of responsibility:

- Officer in Charge (OIC) or Second in Charge (2IC)—responsible for overseeing the conduct of polling at a polling place;

- Declaration Vote Issuing Officer—responsible for issuing declaration votes;

- Polling Assistant and/or Scrutiny Assistant—polling assistants generally issue ordinary votes, act as ballot-box guards or undertake other tasks during polling. Most act as scrutiny assistants on election night, enabling the election night count, but some locations employ scrutiny assistants solely for counting purposes (as well as after election day for fresh and further scrutinies);

- Polling Place Liaison Officer (PPLO)—responsible for travelling between polling places in Divisions ensuring compliance with policies and procedures. PPLOs are normally the first point of contact for OICs if there are issues or questions;

- Mobile Team Leaders and members—responsible for undertaking mobile polling (including remote); and

- other temporary assistants, Voter Information Officers, Inquiry Officers and Visitors—these staff undertake assorted roles during polling and scrutiny.[18]

Recruitment of temporary staff

3.76   For the 2013 election the AEC employed 73 507 temporary staff, which was an increase of 9.9 per cent over 2010 election staffing levels.[19] The

---

18   See AEC, *Submission 20.3*, p. 121.

AEC noted that it had improved recruitment processes to better engage returning polling officials:

> Enhancements to the AEC's recruitment systems following the 2010 election enabled the AEC to maintain online contact with polling officials between electoral events. Previously the AEC, wrote to every applicant that provided a registration of interest form (ROIs) and only entered the ROIs for applicants who replied. The online system was primarily introduced to improve a process that was labour intensive, expensive and difficult to track.
>
> From November 2011 the AEC commenced the first 'soft contact' mail-out where registered applicants were encouraged to update their ROI. A second mail-out was undertaken between February and April 2013. Applicants who were already registered were emailed and provided with information about how to log on to AEC Employment via the AEC's website. Applicants who were not registered for online access were contacted by mail or telephone and asked if they would like to be given online access to maintain their own details. If they wished they were still provided with the opportunity to update their information in hard copy. Key details updated through this process were contact details and periods when applicants would be unavailable.[20]

3.77   In its November 2014 follow-up audit report (Audit Report No. 4 2014–15) on the implementation of audit recommendations made in 2010 regarding the 2007 election, the Australian National Audit Office (ANAO) found that AEC recruitment for the 2013 election 'was significantly more timely than had occurred in relation to the 2007 election.' However, of the roles filled, '34 per cent were filled by people for whom there was no record in AEC Employment of them having been assessed for suitability.' Assessment for suitability fell markedly for employment offers made after the issue of the writ with only 20 per cent of the 14 546 positions filled after this point having being assessed.[21]

3.78   The majority of employment offers were made well before election day, with less than one per cent being made on or after election day. The

19   AEC, *Submission 20.3,* p. 118.

20   AEC, *Submission 20.3,* p. 119.

21   Australian National Audit Office (ANAO), *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, pp. 72, 69.

majority of these late offers were for the polling assistant role; however 40 offers were for OIC or 2IC roles.[22]

Workforce planning

3.79   The short timeframes associated with election delivery and the need to confirm or recruit a workforce within these timeframes will always be an operational challenge for the AEC. However, the 2010 ANAO report on the conduct of the 2007 election (Audit Report No. 28 2009-10) recommended that the AEC improve its workforce planning 'including by critically examining its election workforce needs and workforce composition, and setting goals for the training and retention of election officials.'[23]

3.80   The ANAO's November 2014 follow-up audit report found that the AEC had retained a focus on current operational matters rather than the development of a strategic workforce plan. The audit report acknowledged the challenge faced by the AEC in recruiting at short notice, but recommended that a strategic workforce plan be developed that would:

   ■ cover a period of three to five years and be aligned to the election cycle;
   ■ focus on the composition of the existing workforce and examine high-level trends that may affect future workforce availability;
   ■ describe emerging workforce issues and strategies for managing these; and
   ■ outline a suite of workforce strategies designed to support the recruitment, retention and training of a diverse election ready workforce for future elections.[24]

3.81   The ANAO report noted that in the absence of such a plan, the AEC was not able to address risks to the delivery of future elections, such as the age of the workforce.

3.82   The AEC has identified challenges with future workforce planning in its substantive submission to the Committee, especially related to the ageing nature of its core temporary election workforce.[25]

3.83   The ANAO made recommendations regarding workforce planning in its 2010 report into the conduct of the 2007 federal election, with

---

22   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 71.

23   ANAO, *The Australian Electoral Commission's Preparation for and Conduct of the 2007 Federal General Election*, Audit Report No. 28 2009-10, Recommendation 5(a), p. 109.

24   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 62.

25   AEC, *Submission 20.3*, pp. 126-127.

recommendation 5 focusing on planning for recruitment, training and evaluation.[26] This was followed up by expansion of this recommendation in the 2014 follow-up audit, recommending that the AEC develop an actual workforce plan that can be analysed, updated and monitored.[27]

3.84   These ANAO audit findings are aimed at improving strategic workforce planning, thereby improving the workforce capability of the AEC. The establishment of a plan would allow for accurate recording of goals and expectations, while also allowing the appropriate scrutiny of the planning undertaken.

3.85   Despite these clear and sensible recommendations, the AEC appears to have failed to have recognised the need for such planning to take place for the 2013 election. The AEC noted in its submission to this inquiry:

> Uncertainty relating to the election dates renders attempts at advance recruitment ineffective.[28]

3.86   This statement appears to be contradicted by ANAO data that found that 53 397 people were recruited prior to the issue of the writs.[29] Additionally, the workforce profile for the 2013 election was broadly similar in numbers of officials and types of positions to the 2010 election,[30] suggesting that more strategic planning could have been undertaken.

3.87   While the 2013 election had a very early indicated potential date, this appears to reinforce the ANAO's observations that the AEC has a focus on current workforce pressures, without the strategic forward-thinking required to anticipate changes in workforce composition, recruitment or retention.

3.88   In March 2015 the AEC acknowledged that the ANAO 'rightly criticised' the AEC for its lack of a proper workforce plan. The AEC identified that work had been undertaken on mapping capabilities for polling officials.[31]

Committee comment

3.89   The Committee acknowledges that the rapid employment of a very large temporary workforce is a significant challenge for any organisation, and

---

26   ANAO, *The Australian Electoral Commission's Preparation for and Conduct of the 2007 Federal General Election*, Audit Report No. 28 2009-10, pp. 109-110.

27   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 63.

28   AEC, *Submission 20.3*, p. 123.

29   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 69.

30   AEC, *Submission 20.3*, p. 121.

31   Tom Rogers, Electoral Commissioner, AEC, *Transcript Evidence,* 4 March 2015, Canberra, p. 3.

that there will always be circumstances where positions are filled late due to unforeseen circumstances.

3.90   Although the number of OIC and 2IC employment offers that were made on or after election day in 2013 is of concern, the Committee acknowledges that the AEC made improvements on the number of late offers compared to the 2010 election.

3.91   Nonetheless, it is core business for the AEC to provide the workforce to adequately deliver the election. There appears to be a troubling lack of understanding on the part of the AEC regarding measures that can be put in place to improve recruitment of a temporary workforce, for example in regard to suitability assessment.

3.92   More importantly, the fact that the workforce profile was broadly unchanged between the 2010 and 2013 elections, notwithstanding uncertainty in relation to election dates, indicates that the AEC is not focussing due attention on strategic planning. The Committee is particularly concerned that improved workforce planning was recommended by the ANAO as far back as 2010—yet the AEC has appeared to fail to understand its need or import.

3.93   The Committee notes that the AEC is now engaged in an ongoing dialogue with the ANAO to ensure that the ANAO's recommendations are fully implemented.[32] The Committee welcomes this ongoing dialogue.

3.94   The Committee also notes that innovative ideas were identified during the inquiry about retention and the provision of ongoing training such as the development of a professional association for polling workers.[33] The Committee urges the AEC to open a discussion with polling workers around the issues of recruitment and retention.

3.95   The Committee further notes the AEC's response to the ANAO's recommendation in its November 2014 follow-up audit report:

> The AEC acknowledges that enhancing many elements of election workforce planning that it already undertakes is likely to complement the current work underway to modernise its capacity to engage a temporary workforce at each election (noting the difficulties inherent in planning for a temporary workforce of more than 70 000 employees engaged only once every three years on an unknown date). The AEC will consolidate its approach in this important area and develop an election workforce plan in advance of the expected timing of the next federal election, noting

32   Tom Rogers, a/g Electoral Commissioner, AEC, *Transcript Evidence,* 12 November 2014, Canberra, p. 21.

33   G Field, *Submission 160,* p. [3].

> there will be elements that will be implemented in a staged
> approach over several electoral cycles.[34]

3.96   This is a welcome undertaking and the Committee urges the AEC to
        employ adequate resources to address issues raised by the ANAO and
        progress appropriate workforce planning. This will also enable future
        scrutiny of such planning by this Committee and the ANAO.

Training/learning and development

3.97   Crucial to achieving consistency and accuracy in service delivery and
        election operations is a robust and deliverable training, learning and
        development framework, for both permanent and temporary staff and for
        election officials.

3.98   The training of the 70 000-strong temporary workforce responsible for
        delivering the election is primarily undertaken by DROs, and the OICs
        trained by those DROs. There is considerable variety within these roles, so
        adequate training and awareness are key to enabling temporary staff to
        play their part in a lawful election. Given the fundamental importance of
        delivering elections lawfully, awareness of the implications for non-
        compliance should not be understated.

3.99   The issues that have been identified throughout this inquiry would
        suggest that the existing framework prior to the 2013 election either was
        not robust enough, or that the adherence of trained staff and officials to
        the requirements communicated by the training was not adequately
        enforced or stressed in some situations.

3.100   Polling officials are trained for each election, either face-to-face for more
        senior officials (OICs and 2ICs), or through the provision of training
        materials for more junior roles (issuing officers). Most polling officials do
        not receive practical training, rather relying on experience or brief training
        on the day, either before polling begins or on-the-job.

3.101   Some polling officials will have undertaken polling activity before, either
        at a state or federal level, with the AEC indicating a range from a high of
        95.7 per cent of polling place liaison officers having had previous
        experience to a low of 10.12 per cent of scrutiny assistants having had
        previous experience.[35]

3.102   In its evidence to the Committee the AEC stated that:

---

34   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the
     Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 63.

35   AEC, *Submission 20.2*, pp. 2-3..

The AEC requires senior polling officials to undertake training prior to polling day and the commencement of their duties. This training is designed to provide polling officials with the skills and knowledge to competently perform their role. Junior polling officials such as polling assistants, ballot box guards and queue controllers are provided with other tools and training materials to ensure they are aware of their duties. This is complemented by further on-site training on election day morning and they can refer to guides during election day as needed.

In preparation for the 2013 election the AEC implemented the recommendations from the Gray Report by increasing the training to be provided to pre-poll officers and ensuring that all pre-poll staff received training.

…

Within 24 hours of confirmation of offers of employment the employee is enrolled in the curriculum and invited to commence their training. For the 2013 election senior polling officials were required to complete a two stage training program:

- initial home-based training, and
- further face-to-face learning.[36]

3.103 Training materials for polling officials provided by the AEC include a procedures handbook, a DVD and online training:

- The Election Procedures Handbook, containing all required information relevant to each staff member's role to conduct polling and undertake counting, [is] sent to each polling official. It also incorporates administrative, emergency and workplace health and safety guidance. Copies are also available in each polling place.
- The DVD sent to each polling official. This was developed in 2012 to provide information about what a polling place looks like, how it operates, team work and procedures. A shortened version was also available on YouTube.
- Role badges and quick reference guide on polling official lanyards.
- Place cards with quick reference guide for all issuing officers and officers in charge in static and pre-poll polling places.[37]

3.104 The home based-training is complemented by face-to-face training to be completed to the satisfaction of the DRO, and senior polling place officials receive a payment for the completion of this training. The AEC stated:

---

36   AEC, *Submission 20.3*, p. 126.
37   AEC, *Submission 20.3*, p. 125.

> for some individuals in remote and rural areas, their face-to-face
> training is over the phone; that will count as attendance for face-
> to-face training even though it is not. That is why we put in the
> policy that it is to the satisfaction of the DRO. Our expectation is
> the vast majority of that is face-to-face training, except where it
> can't be done for those circumstances—over the phone. I would
> presume that it would not even be for emergency training on the
> morning; it would be for face to face or where face to face cannot
> be delivered and so over the phone or some sort of exigent
> circumstance like that, but to the satisfaction to the DRO.[38]

3.105   In its submission, the AEC indicated that just over 19 per cent of senior
         polling officials completed manual workbook training under divisional
         staff monitoring.[39] However, when reviewed by the ANAO, AEC data
         indicated that the training status of this group of senior officials was in
         fact 'in progress' rather than completed. As the ANAO noted, this 'ran the
         risk of misleading' this Committee.[40]

3.106   Broader ANAO analysis of training completions also found that, for the
         2013 election, 20 per cent of people filling election roles requiring home-
         based training did not fully complete this training. Further, the ANAO
         found that, for 15 per cent of officials, there was either no record of
         completion or no record of having been assigned training (see Table 3.2).

Table 3.2   Completion of home-based training by election officials

Role	Completed	Partial completion	No record of completion	No record of being assigned to training	Total
Declaration Vote Issuing Officer	11 824	653	2 014	397	14 888
Mobile Team Leader	335	25	76	21	457
Mobile Team Member	421	28	112	31	592
OIC/2IC/PPLO	10 612	510	1 196	313	12 631
Pre-poll Issuing Officer	2 460	301	479	141	3 381
Pre-poll OIC	608	119	99	20	846
Remote mobile Team Leader	30	2	11		43

38   Tom Rogers, a/g Electoral Commissioner, AEC, *Transcript of evidence*, 13 November 2014,
     Canberra, p. 7.

39   AEC, *Submission 20.3*, p. 129.

40   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the
     Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 79.

Remote Mobile Team Member	7	2	5	3	17
Total	26 297	1640	3992	926	32 855
Per cent	80.0	5.0	12.2	2.8	100.00

Source   ANAO, Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections, Performance Audit Report No. 4 2014-15, November 2014, p. 80.

3.107   For the critical OIC role, training completion rates were slightly better; however 3.3 per cent of officers did not fully complete home-based training, and there was no record of completion or no record of having been assigned training for 11.6 per cent of officials (see Table 3.3).

3.108   Further, the ANAO found that for the 2014 WA Senate election re-run, nine per cent of election officials (273 officials) did not complete all of the required training. Furthermore, 49 officials did not complete either the face-to-face or the home-based training. This group included three officials in senior roles, and only one was issued a Notice of Training Exemption.[41]

Table 3.3   Completion of home-based training by role—static polling place officers-in-charge

Role	Completed	Partial completion	No record of completion	No record of being assigned to training	Total
OIC 1-3 issuing points	2 278	88	278	110	2 754
OIC 4-6 issuing points	2 075	82	205	54	2 416
OIC 7-10 issuing points	1 734	62	168	18	1 982
OIC 11+ issuing points	341	13	34	3	391
Total	6 428	245	685	185	7 543
Per cent	85.2	3.3	9.1	2.5	100.0

Source   ANAO, Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections, Performance Audit Report No. 4 2014-15, November 2014, p. 80

3.109   In response to the audit findings, the then acting Electoral Commissioner, Mr Tom Rogers, noted that there are some circumstances that do not allow for staff to complete training because of the late nature of their employment, and acknowledged the need to provide training on multiple platforms in order to cover these circumstances.[42]

41   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 84.

42   Tom Rogers, a/g Electoral Commissioner, AEC, *Transcript of evidence*, 13 November 2014, Canberra, p. 9.

3.110   The ANAO has noted that, prior to the February 2014 Griffith by-election, face-to-face training attendance records were only kept by the Divisions.[43] This meant that the AEC national office had no way of assessing the completion of training through this method or the effectiveness of this approach.

3.111   Indeed, during hearings with the AEC, the Committee was unable to gain consistent evidence on training completion, satisfaction or assessment. Mr Rogers acknowledged problems both with training and training data:

> It is quite clear, as you have said, that there is an issue around the training and we are addressing that—it is clearly not right. The second issue, as you correctly pointed out and the ANAO have pointed out, is the way in which our data is being compiled; it is impossible to know to 100 per cent satisfaction. This is a real problem for us. It is not just the data that we have, but the processes around how we have entered that data previously have not been good enough. That may well have led to issues in the polling place. As you quite rightly point out, we do not know.[44]

3.112   The lack of data is a systems problem, but was further acknowledged as being a cultural issue as well:

> There is also a cultural issue. Some of the points that we are making here today about recording training completion is a cultural issue for our staff. We are also working to fix that element. That is because we could have the best systems in the world but if they are not used properly we will be back at this committee with a similar issue next time, and we cannot have that.[45]

3.113   Also concerning are findings of experienced senior polling officials' lack of adherence to training and directives. ANAO investigation indicated that the AEC's reported compliance rate for OICs providing required briefings to election officials was higher than the actual level of compliance. The ANAO noted, for example, that:

> 'only 26 of the 203 polling place inspection checklists included comments on both aspects of this question, being that the briefing was completed and staff were receptive; and

---

43   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 83.

44   Tom Rogers, a/g Electoral Commissioner, AEC, *Transcript of Evidence*, 13 November 2014, Canberra, p. 8.

45   Tom Rogers, a/g Electoral Commissioner, AEC, *Transcript of Evidence*, 13 November 2014, Canberra, p. 10.

> only 25 of the 203 polling pace inspection records (12 per cent)
> supported a conclusion that the briefing checklist provided to
> OICs had been used.
>
> …
>
> Where comments were recorded by the KITE [Keelty
> Implementation Team Extended] teams, the comments included
> that the OIC had completed the briefing, but that had done so 'off
> the cuff' or 'knew it off by heart', 'did it in own words', or that the
> 'OIC assured us that they had completed the briefing'.[46]

3.114   Mr Rogers noted that the AEC is aware of this issue:

> experience is good, but I point out that occasionally that
> experience is not good because when we go through changes in
> training some of the people who have been doing it for a while
> think, 'I understand that, I have already done it.'[47]

3.115   OICs are key positions and this attitude is concerning, particularly as OICs
are not aware of what level of training polling officers have completed.[48]

3.116   The revelation of multiple errors, resulting in incorrect handling of ballot
papers and lost parcels of ballot papers, suggests that the AEC does not
place enough emphasis on the importance of adherence to relevant
training, or on the competence or accountability of polling officials that is
commensurate with the level of impact that their actions have on the
democratic process, and ultimately the outcomes of elections held in
Australia.

3.117   The varied responses by polling officials to the incorrect treatment and
handling of declaration votes in multiple locations in South Australia,
where 331 Senate ballot papers from declaration votes were placed in
ordinary ballot boxes,[49] indicates a concerning lack or training or an even
more concerning disregard for training:

> It was three polling places in South Australia, with 224 at the
> Walkerville polling place, in the division of Adelaide; 15 at the
> Birdwood polling place, in the Adelaide Hills in the division of
> Mayo; and 92 at the Gawler polling place, in the division of
> Wakefield. I would like to state that at both the Walkerville and

---

46   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 106.

47   Tom Rogers, a/g Electoral Commissioner, AEC, *Transcript of evidence*, 12 March 2014, Canberra, p. 16.

48   Doug Orr, NSW State Manager, AEC, *Proof transcript of evidence,* 12 November 2014, Canberra, p. 23.

49   AEC, *Submission 20.3*, p. 82.

the Gawler polling places it was every single absent vote that was
taken throughout the day. The Birdwood polling place was picked
up during the day. Presumably, the officer in charge has identified
that an error in practice had been going on, and it has been
corrected at some point.[50]

3.118   The fact that at some point during the day a staff member at the Birdwood
polling place detected a failing, but it was left to occur for the entirety of
election day in the other two locations, suggests a failure in the training,
awareness and capability of both the declaration vote issuing officers and
the officers in charge in relation to issuing and receiving these votes
correctly.

3.119   This example of inconsistency highlights the failings in the AEC's
framework of training, competency and trust in relation to temporary
employees and their duty to accurately and lawfully deliver an election.

3.120   In addition, the findings by the ANAO that significant proportions of
polling officials did not fully complete their home-based training, and
that, further, there was either no record of completion or no record of
having been assigned training for significant proportions of officials, are
indicative of the failure of the training systems in place.[51]

3.121   In relation to face-to-face training, the ANAO noted an 82 per cent
satisfaction rating, but:

In comparison to the AEC's other training, respondents did not
feel that the face-to-face training as clearly explained AEC election
procedures and requirements, or that the training gave them a
good understanding of their role and responsibilities.[52]

3.122   This finding is supported by evidence to this inquiry:

As an OIC/PPLO I feel that the training provided requires
considerable improvement. Training for the 2013 Federal Election
comprised 90 minutes for Declaration Officers and 180 for OICs
2ICs and PPLOs in-addition.[53]

---

50   Kevin Kitson, a/g Deputy Electoral Commissioner, AEC, *Transcript of evidence,* 11 June 2014,
     Adelaide, p. 4.

51   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the
     Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, pp. 78-
     82.

52   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the
     Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 82.

53   G Field, *Submission 160*, p. [2].

3.123   DROs are required to deliver this training alongside their other responsibilities preparing for an election. The evidence would suggest that there is a difficulty for some in acquitting this responsibility adequately.

Current AEC focus

3.124   The AEC informed the Committee that, following the 2013 election, it has commenced new work focussing on revising and renewing the learning and development capacity within the organisation based on:

- a focus on performance coaching—to create a culture of performance through learning, performing and feedback;
- development of certification processes and competency-based assessment—to assess ability against key capabilities in order to be assigned to various roles;
- the adoption of key principles and shared frameworks for learning design—to create learning programmes that are performance focussed and outcome driven and that use authentic contexts in which learners make realistic decisions and gain a sense of real world consequences; and
- a redefined role for the Learning and Development Team to create a centralised national training model.[54]

3.125   This is to be supplemented by new training IT systems, practical training programmes for staff and focussed training for temporary officials.[55]

3.126   In March 2015 the AEC informed the Committee that the newly-developed Learning Management System has been implemented.[56]

Committee comment

3.127   The AEC's renewed focus on learning and development is welcomed by the Committee and is absolutely necessary in addressing the issues identified with training and capability building. The focus on learning programmes which acknowledge the importance of possible real world consequences is especially salient given the evidence received during this inquiry. These real-world consequences can be twofold:

- the consequences for potential election outcomes—poor practice can lead to lost or discounted ballot papers (prematurely opened ballot-boxes, poor labelling or transport); and

---

54   AEC, *Submission 20.6*, p. 20.

55   AEC, *Submission 20.6*, pp. 20-21.

56   Tom Rogers, Electoral Commissioner, AEC, *Transcript of evidence*, 4 March 2015, Canberra, p. 2.

- the consequences that should flow from poor practice—sanctions, penalties and individual ramifications for staff or polling officials that do not complete their activities according to training or legislation.

3.128   Evidence received by the Committee, and the November 2014 ANAO audit report (Audit Report No. 4 2014–15), would suggest that the AEC is focussing on the first set of consequences, but not necessarily the second.

3.129   Anecdotal evidence was provided in a number of submissions outlining possible dereliction of duty and incorrect practices on the part of polling officials.[57] In addition, direct evidence was received from the AEC about incorrect practice by senior polling officials and the differing approach by DROs, where officials were either immediately removed from duty or no action was taken.[58]

3.130   It is of concern to the Committee that there appeared to be little or no follow-up action with these officials, let alone application of the appropriate penalties required by the Electoral Act.

3.131   The Committee acknowledges that while some responsibilities for polling staff are relatively simple to acquit (the issuing of ballot papers), they are all responsible for administering the conduct of the election as prescribed by the Electoral Act.

3.132   The Committee notes that there are serious consequences for breaches of the Electoral Act. For example, section 324 of the Act provides for a fine of up to $1 000 for an officer (including a polling official) who contravenes the Electoral Act or a direction given to them.

3.133   The Electoral Act contains such penalties because the management of ballot papers is a critical component of the electoral system and ensuring its integrity. All employees, temporary or otherwise should be made to understand the import of their positions and this goes to the adequacy of the AEC's training of staff.

3.134   A lack of appropriate responses to incorrect practices or other non-acquittal of duties undermines the importance of the impact of peoples' actions, and highlights the emphasis that should be placed on full and adequate training, in accordance with the law.

3.135   The Committee notes with interest the initial steps the AEC has taken towards building clear capabilities for polling officials and looks forward to seeing the impact of this, and extension of similar capabilities to permanent staff in future elections.

---

57   I Brightwell, *Submission 42*, p. 8; M McKellar, *Submission 26*; C Palmer MP, *Submission 92*; B Kirkpatrick, *Submission 183*, pp. 3-4.

58   David Molnar, AEC, *Transcript of Evidence*, 16 April 2014, Hobart, p. 6; Kathy Mitchell, a/g WA State Manager, AEC, *Transcript of Evidence*, 11 June 2014, Adelaide, p. 43.

3.136 However, the Committee is of the view that there is a need for further focus on ongoing certification for polling officials including access to dedicated training, outside of election periods, for interested parties.

3.137 It was put to the Committee that some formal skills recognition would be desirable for recruitment and staffing purposes:

> As a result of my casual electoral work I have obtained numerous skills and knowledge unique to polling yet I have no formal recognition. The skills and knowledge required for the various positions should be part of the recruitment process.

> Various industries can issue a Cert 2 or 3 for short term training – e.g. White Card, RSA, Cleaning, and Traffic Control. Once issued with a certificate this could be used for staffing purposes.[59]

3.138 In addition, while the AEC's training materials are of high quality, further work needs to be undertaken to determine whether there is a need for an improved delivery method for face-to-face training and to make training materials available on alternative platforms, such as searchable phone or tablet apps, to better support staff on the day in polling places.

3.139 The Committee notes that the AEC has recently issued a tender for the redesign of its training materials and the Committee will monitor the progress of this work with interest.

3.140 The Committee believes that there would be real value in the development of a formal qualification that qualifies individuals to serve as a polling official, in particular for the senior roles. The Committee considers that providing formal recognition and certification for skills and training would improve retention and provide an additional incentive for individuals to serve as polling officials by raising the status of the role.

Recommendation 5

The Committee recommends that the Australian Electoral Commission develop a set of formal qualifications/certification for polling officials.

3.141 The Committee is also concerned about evidence that the AEC does not have adequate systems in place to track, at a national level, training rate completions.

---

59   G Field, *Submission 160,* p. [3].

3.142   To be unable to report on the numbers of allocated face-to-face training
         sessions and their related completions at a Divisional level, due to a lack
         of data in the relevant systems, is unacceptable. Accordingly, the AEC
         must prioritise development of adequate systems to enable the capture of
         this data.

> ### Recommendation 6
>
> **The Committee recommends that the Australian Electoral Commission
> prioritise development of appropriate changes to existing systems, or
> new systems, to allow for the compulsory recording and capture of data
> related to Division-level face-to-face training for polling officials.**

3.143   The Committee is further concerned about evidence that OICs are not
         made aware of the level of training that each staff member reporting to
         them has completed. This makes their role more challenging when
         supervising staff and assigning responsibility on election day. The
         Committee acknowledges that some roles undertaken on election day are
         relatively simple and do not require a high degree of training, and that the
         AEC provides supportive material in polling places for these roles.[60]

3.144   Nonetheless, as supervisors, OICs and 2ICs should be fully aware of
         which of their staff are fully trained and who may need additional
         support.

> ### Recommendation 7
>
> **The Committee recommends that the Australian Electoral Commission
> ensure that Officers-in-Charge of polling places be given a list of
> training completion for all staff reporting to them.**

Performance measurement

3.145   The 2010 ANAO report on the conduct of the 2007 election (Audit Report
         No. 28 2009–10) recommended that comprehensive performance
         standards be developed for the conduct of elections (recommendation 9).[61]
         While the AEC has a performance rating process for staff, there isn't a

---

60   For example, role responsibilities are printed on the back of all relevant name plates and
     badges.

61   ANAO, *The Australian Electoral Commission's Preparation for and Conduct of the 2007 Federal
     General Election*, Audit Report No. 28 2009-10, p. 176.

direct assessment system for the conduct of elections as a discrete part of staff employment.

3.146   The AEC agreed to this recommendation, and, during the Committee's inquiry, responded further when questioned about its follow-up activity to the ANAO recommendations.[62] These responses included:

- internal staff work level standards for performance agreements;

- development of a Performance Management Program for managing underperformance and misconduct;

- local development of standards applied separately at a state level, in some instances; and

- project planning templates for election delivery in Divisions.[63]

3.147   However, the measures outlined above and implemented by the AEC and its reporting to the Parliament (outside of the Committee's process) have not been fully realised in line with the Auditor-General's comments or the expectations of the Committee.

3.148   Of particular interest is the lack of clearly developed national Key Performance Indicators (KPIs) and standards that would allow the AEC and the Parliament to measure performance against national programme directions for conduct of elections, as well as against legislative, policy and procedural requirements. The AEC has acknowledged this lack, but development has not progressed further.[64]

3.149   The November 2014 ANAO follow-up audit report (Audit Report No. 4 2014–15) considers the AEC's completion of performance assessments of polling officials employed for the 2013 election.[65] In summary, there were distinct failings, with the ANAO finding that a 'significant proportion' of officials were not aware of relevant performance standards and that performance ratings for election roles have not been recorded consistently.[66] The ANAO noted that:

> Failure by the AEC to undertake performance assessments and record performance ratings against election roles, especially senior roles such as OICs, has significantly reduced the business benefits expected to be derived from the performance appraisal process. In

---

62   AEC, *Submission 20.4*.

63   AEC, *Submission 20.4*, pp. 34-36.

64   AEC, *Submission 20.6*, p. 23.

65   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, pp. 86-97.

66   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 96.

particular, the available data suggests that previous election performance is a useful indicator of how people who are re-employed will perform at a subsequent election.[67]

3.150   A crucial mechanism that would facilitate consistency in delivering election-related tasks and rebuilding confidence is proper setting and communication of performance measures and indicators, and reporting assessments against these standards to the Parliament above and beyond what the AEC currently does. In its November 2014 report the ANAO recommended that:

> Recognising the benefits that accrue to the AEC in re-employing election officials that have previously performed at or above the required standard, ANAO recommends that the AEC:
>
> (a) more clearly and consistently outline to temporary election employees the performance standards of the role to which they have been assigned and will be assessed against; and
>
> (b) implement controls that ensure the timely completion of performance assessments, including the recording of ratings in the relevant system and each temporary election official being advised of their rating.[68]

3.151   While the AEC has agreed to this, its response to the ANAO's recommendation in Audit Report No. 28 concerning the development of comprehensive performance measures for the conduct of elections is insufficient. The AEC's response has been to develop internal tools, reviewed internally. These do not create the comprehensive, overarching performance standard framework that would allow for adequate visibility of and reporting on election conduct.[69]

3.152   The Committee notes that the recent development of some polling official capabilities and job profiles may assist with this process, but will only constitute an element of developing robust performance measurement frameworks.

---

67   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, pp. 23-24.

68   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 97.

69   AEC, *Submission 20.4*, pp. 34-35.

Staff performance measurement

3.153 The Committee supports the ANAO's 2010 recommendation and follow-up recommendations in the November 2014 audit report. But there is also a need for more robust individual performance measures to increase AEC staff accountability. These performance measures, in the form of clearly stated outputs or KPIs, need to be introduced at all levels, for both permanent and temporary staff and officials. The revelations of state and senior management conduct in WA and South Australia (outlined in Chapter 2) highlight that this is relevant to the upper reaches of AEC management as well.

3.154 In addition, there has been evidence of instances where polling officials and some permanent staff have deviated from the stated legislation, policy or procedures for conducting an election. These may have been relatively minor, such as voters not being marked correctly off a certified list, up to major errors from permanent employees, such as the poor management, labelling and despatch of Senate ballot papers in the Division of Pearce in the 2013 WA Senate election. This latter issue was identified as one of the possible causes for the lost ballot papers that eventually led to the requirement to re-run the Senate election, at great expense to the Australian taxpayer.[70]

3.155 The Keelty Report on the events of the 2013 election in WA acknowledges that the AEC has some clear and concise policies and procedures.[71] However, the lack of guidance on certain issues (such as waste management), adherence to these requirements, and the sometimes serious consequences of non-compliance are yet another reason to develop clearer and wider-ranging policies and procedures—with, importantly, associated performance measures against these rules.

3.156 The rules can then be enforced with related sanctions for non-compliance—sanctions that are applicable regardless of the level of the employee or their employment status (temporary or permanent).

3.157 The AEC has already undertaken, and is still undertaking, work in developing these sorts of policies and procedures in response to the Keelty Report and subsequent developments, but strict adherence to policies and procedures needs to be enforced and recorded.

---

70 AEC, *Submission 20.3*, p. 82; AEC, 2013, *Inquiry into the 2013 WA Senate Election*, Canberra, p. 8.

71 AEC, 2013, *Inquiry into the 2013 WA Senate Election*, Canberra, p. 12.

Committee comment

3.158   The Committee is concerned about the apparent inadequacy of performance measurement mechanisms within the AEC. The Committee endorses the ANAO's recommendations in relation to performance assessment of temporary staff. The Committee is also of the view that permanent staff should have clear KPI expectations set, especially in relation to core election delivery activities.

3.159   The ANAO recommendation, in its 2010 report,[72] to establish clear performance standards for the conduct of elections is a crucial element of this work which the AEC has indicated is underway and will be in place for the next federal election.[73] However, as noted, there is a need for the AEC to develop a more comprehensive performance standard framework because of the disparate performance outcomes demonstrated by staff throughout the organisation.

3.160   KPIs for all senior service delivery staff should be established, from the DRO up to the state manager. These KPIs can then provide relevant development and performance measurement metrics to improve staff roles and accountability.

Recommendation 8

> **The Committee recommends that the Australian Electoral Commission develop a full set of relevant key performance indicators for all senior service delivery staff, to be measured and reported to the Parliament as part of federal election inquiry reporting.**

Corporate identity and culture

3.161   Throughout the conduct of this inquiry the Committee has received regular briefings, evidence and submissions from the AEC on the 2013 election and subsequent electoral events and developments related to the Keelty Report.

3.162   As discussed throughout this report, there are a number of cultural issues within the AEC ranging from the treatment of ballot papers to the attitude towards Senate ballot papers.

---

72   ANAO, *The Australian Electoral Commission's Preparation for and Conduct of the 2007 Federal General Election*, Audit Report No. 28 2009-10, p. 176.

73   AEC, *Submission 20.6*, pp. 22-23.

3.163   While the AEC has been apologetic and candid in its evidence, outlining many of the processes it has started to remedy many of the criticisms laid upon it after the 2013 election (including those outlined above), the Committee believes that the nature of these responses is marred by one clear flaw: the nature of the AEC's organisational self-awareness and its ability to adapt its culture.

3.164   As noted in Chapter 2, problematic aspects of AEC organisational culture were identified by Mr Keelty during his investigation into the WA Senate election issues, where he identified a culture of complacency and non-compliance in the WA state office. This was expanded on in Mr Keelty's evidence to the Committee as to the cause of this culture and how to address it:

> changing the culture will be through leadership and through rotating staff. A lot of staff have been there for a very long time and have not had much movement, so they are used to doing things the way that they have been doing them.[74]

Corporate identity and corporate culture

3.165   The AEC has traditionally been held in high regard throughout the national and international electoral community. This regard was seriously eroded by the events of the 2013 election.

3.166   Australia ranks fourteenth on the international Perceptions of Electoral Integrity Index maintained by the Electoral Integrity Project.[75] This high integrity and international regard is reflected in the AEC's assistance in electoral processes in countries ranging from Fiji to Montenegro.[76] Assistance in international electoral conduct and accountability is an essential measure and one in which the AEC has performed admirably over recent decades.

3.167   Throughout the evidence presented by the AEC to the Committee and in many of its statements to the media and wider public, there has been an acknowledgement of the failings of the events during the 2013 election and the processes in place to address them.

---

74   AEC, 2013, *Inquiry into the 2013 WA Senate Election*, Canberra, p. 6; Michael Keelty, *Transcript of Evidence*, 5 March 2014, Canberra, p. 5.

75   The Electoral Integrity Project, *The Year in Elections 2013, The World's Flawed and Failed Contests*, p. 9, accessed 14 November 2014, <bishop.hul.harvard.edu/bitstream/handle/1/11744445/Norris-TheYearInElections.pdf?sequence=1>.

76   AEC, *International Electoral Services*, accessed 14 November 2014, <aec.gov.au/About_AEC/AEC_Services/International_Services/index.htm>.

3.168   However, surrounding these statements and underpinning the failings
         themselves have been statements by the AEC to the effect that the work
         undertaken by the agency is difficult and that critics do not understand
         the complexities of the work involved. For example, in agreeing to the
         ANAO's recommendation regarding workforce planning in the November
         2014 follow-up audit report, the AEC qualified its acceptance of the
         recommendation with the following justification:

> noting the difficulties inherent in planning for a temporary
> workforce of more than 70 000 employees engaged only once
> every three years on an unknown date.[77]

3.169   While such difficulty and complexity is undoubtedly a significant feature
         of AEC business, this indicator of an organisational identity coloured by
         operational difficulty and external misunderstanding of the business
         suggests a sense of corporate 'exclusivity'.

3.170   While the AEC's reactions have not been characterised entirely by this—
         there are indicators of external adaptation and engagement to analyse and
         improve the business—the reactions of the agency to audit criticism, as
         well as aspects of scrutiny by the Committee (especially by AEC state
         managers to questions of operations and improvement), have raised a
         level of doubt for the Committee about the AEC's ability to adequately
         react to the demands for change after the 2013 election.

3.171   The AEC does not project a strong public corporate identity outside of the
         necessary enrolment and election interactions that are required for roll
         maintenance and conduct of elections. As a result, apart from such
         mechanisms as periodic scrutiny by Electoral Matters Committees, Senate
         Estimates and the ANAO, there is little external access to or visibility of
         internal AEC process.

3.172   The increased attention on the AEC following the 2013 election, and the
         spotlight this has placed on AEC business, affects both internal and
         external opinions of culture and identity.[78] Increased attention or access
         means that observers can start to question the culture of an organisation,
         while people within the organisation can start to question their own
         business and motives as well. While individual performance management
         has been an important focus for the Committee's inquiry and for the
         ANAO, the *culture* of the organisation must also be performance-driven.

---

77   ANAO, *Second Follow-up Audit into the Australian Electoral Commission's Preparation for the
      Conduct of Federal Elections*, Performance Audit Report No. 4 2014–15, November 2014, p. 63.

78   See Hatch and Schultz, 'The dynamics of organizational identity', *Human Relations*, vol. 55, no.
      8, August 2002, pp. 990-991.

3.173   Organisational culture can mean many things to many people, but more generally it can be defined as:

> Culture is the way things get done in an organization and reflects employees' behaviors and attitudes toward work. It is the 'secret sauce' of an organization, bringing a strategy to life or deadening it. Culture is not fixed.[79]

3.174   In the relevant literature, rotation of staff is recognised as being an important characteristic of high-performing organisations, including in the context of longer careers within single organisations:

> High-performance organizations invest in employee development through training *and* by rotating people through roles and responsibilities. These experiences are a powerful motivational and retention tool…They also encourage collaboration and reduce the likelihood of parochial leadership behaviour. By the time employees reach the top ranks, they have a broad view of the organization.[80]

3.175   The problematic aspects of structure and permanent staff makeup more broadly within the AEC are discussed earlier in this chapter, but the exposure of certain elements of AEC culture as outlined above strongly suggests that cultural change is also required within the organisation. The Committee's doubts about the ability of the AEC to effect change adequately leads to the conclusion that change may need to be catalysed and managed in conjunction with input from outside the AEC.

Developing a performance-driven culture

3.176   In recent years, the Australian Public Service Commission (APSC) has focused on corporate leadership in the APS, mainly through its 'Strengthening the Performance Framework' project.[81]

3.177   The flat middle-management structure of the AEC national office lends itself to a workforce that should be capable of embracing change and translating strategy into action. As noted above, however, as is often the case with commercial entities and public service agencies, middle management staff are often the most neglected staff.

---

79   The Boston Consulting Group, *High-Performance Organizations: The Secrets of Their Success*, September 2011, p. 10.

80   The Boston Consulting Group, *High-Performance Organizations: The Secrets of Their Success*, September 2011, p. 8.

81   Australian Public Service Commission, *Strengthening the Performance Framework Project*, accessed 18 November 2014, <apsc.gov.au/projects/performance-framework>.

3.178   In order to adequately engage with this staff cohort and effect change, organisations need to have a performance-driven culture on an agency-wide level.

3.179   A performance-driven culture guides staff in the expectations of the agency and the public service as a whole, ultimately creating a culture of achievement and change. The APSC has highlighted key actions that agencies can undertake to strengthen performance and performance management that can drive this cultural change including:

■ discuss and define what high performance means at the agency, group and individual level within an agency;

■ ensure that agency goals are clearly understood and the importance of those goals is made relevant to each employee;

■ provide managers with guidance on how to set goals and provide feedback on performance: for example immediately prior to the commencement of the review cycle; [and]

■ ensure managers are held accountable for supporting, maintaining and improving the performance of their staff.[82]

3.180   These principles underpin the actions that an agency must undertake to manage its performance. In order for such measures to work, the interplay between organisational culture, management and performance measurement must be maintained and analysed. The Centre for Strategic Manufacturing has also noted that:

> management styles need to evolve as the maturity of the performance measurement system and the organisational culture evolve.[83]

3.181   The AEC has indicated that it has engaged outside consultants to analyse and critique its planning, governance and preparation ethos,[84] but, in the Committee's view more is required to facilitate the required change, especially if these cultural elements are to be integrated into the KPIs to be developed as a result of Recommendation 8.

---

82   Blackman, D., Buick, F., O'Donnell, M., O'Flynn, J. and West, D. (2013), *Strengthening the Performance Framework: Towards a High Performing Australian Public Service*, Australian Public Service Commission, Canberra, p. 2.

83   Bitici, Mendibil, Nudurupati, Garengo and Turner, 'Dynamics of performance measurement and organisational culture', *International Journal of Operations & Production Management*, vol. 26, no. 12, 2006, p. 1344.

84   Tom Rogers, a/g Electoral Commissioner, AEC, *Transcript of Evidence*, 13 November 2014, Canberra, p. 20.

3.182   In March 2015 the Electoral Commissioner told the Committee that the AEC is informing its staff of 'the need for [staff] to put electoral integrity back into the heart of our processes',[85] and:

> That is surrounded by a mantra that we are using at the moment called 'Every task matters,' because it is important all the way down. But putting that as a screen saver on a computer does not change culture. That is a long journey of continual messaging and working with our staff who, frankly, want to do the right thing and to be assisted to do that.[86]

3.183   Additionally, in correspondence to the Committee received in the final stages of this inquiry, the AEC outlined that it is developing and implementing a new values and behaviours framework, endorsing its Electoral Integrity Framework, as well as ongoing consultation with the ANAO and other measures.[87]

Committee comment

3.184   The Committee is concerned that the corporate culture of the AEC is such that the AEC is unable to effect the level of organisational change necessary for the agency to reform its culture and business in order to allow it to be a high-performing, independent electoral authority into the future.

3.185   The challenge facing the AEC is that senior management may have difficulty driving the changes required that will effectively bring about performance-focussed organisational culture. The Electoral Commissioner's highlighting of a focus on electoral integrity is encouraging, but adoption of this throughout the entire organisation is always going to be a challenge.

3.186   Current AEC efforts to emphasise the importance of every task to staff are commendable, but more needs to occur for effective cultural change, in both the short and long term. Internally-driven measures can only achieve so much cultural change, when an organisation is trying to change itself.

3.187   From the Committee's perspective, the events of the 2013 federal election did not just highlight aspects of the core election delivery business that needed reforming, but cracked open the veneer of the AEC to public scrutiny, highlighting the flaws in its structure, operations and staffing.

---

85   Tom Rogers, Electoral Commissioner, AEC, *Transcript of Evidence*, 4 March 2015, Canberra, p. 6.

86   Tom Rogers, Electoral Commissioner, AEC, *Transcript of Evidence*, 4 March 2015, Canberra, p. 6.

87   Correspondence to the Committee from the AEC dated 30 March 2015.

3.188   While the core mechanics of election delivery are the focus of much of the work underway by the AEC, the Committee feels that organisational renewal is also required to enable a modern, capable AEC to deliver elections and undertake meaningful change into the future.

3.189   The recommendations relating to the roles of AEOs and state managers and performance measurement set out earlier in this Chapter will go some way to achieving this, but the Committee believes that in order for effective change in relation to AEC culture to be achieved, and to foster the development of open and transparent processes, external guidance is required.

3.190   The AEC has already obtained consultancy guidance on how to manage logistics and planning for the delivery of elections, as well as gaining consultancy analysis and a 'health check' of their reform responses.[88]

3.191   However, there is an equivalent need for guidance on how to manage performance measurement reform, organisational renewal, knowledge and capability within the organisation as a whole. This guidance can come partly from the work that the APSC has done on outlining high-performance requirements for public service agencies—but there will always be gaps when the public service analyses itself and attempts to create change and innovation.

3.192   Accordingly, it would be desirable for the AEC to engage with the APSC and organisational culture management specialists to enable the level of reform and culture change required.

3.193   This engagement will require oversight of a collaborative nature, both within the public service and from subject matter experts. Accordingly, the Committee believes that an oversight committee should be established comprising:

   ■ the Electoral Commissioner;

   ■ the Auditor-General;

   ■ the Australian Public Service Commissioner; and

   ■ an appropriately qualified private industry or academic subject matter expert on organisational culture and performance management.

3.194   This Committee can then review the reform process.

---

88   Pablo Carpay, First Assistant Commissioner, AEC, *Transcript of Evidence*, 4 March 2015, Canberra, p. 4.

Recommendation 9

The Committee recommends that the Australian Electoral Commission commence a corporate culture, leadership and performance measurement reform programme.

This programme should be formulated in consultation with the Australian Public Service Commission and a suitably qualified organisational culture and management consultant, gained through an open market tender.

This programme should then be overseen by a committee comprising:

- **the Electoral Commissioner;**
- **the Auditor-General;**
- **the Australian Public Service Commissioner; and**
- **an appropriately qualified private industry or academic subject matter expert on organisational culture and performance management.**