

Multiple voter policy

Contents

1. Abbreviations and definitions	2
Abbreviations	2
Definitions	2
2. Introduction	3
3. Purpose	4
4. Scope	4
5. Policy	5
Circumstances enabling a declaration	5
Declaration where an elector is convicted of multiple voting	5
Declaration where an elector is suspected of multiple voting	7
Effects of declaration	11
Determining length of order	11
Irrelevant considerations	12
Privacy considerations	12
6. Relevant legislation	13
7. Roles and responsibilities in relation to this policy	13
8. Monitoring, evaluation and review of this policy	13
9. Associated documents	14
10. Document control	14
Document management	14
Publication details	14
Review record	15

1. Abbreviations and definitions

Abbreviations

Electoral Act	<i>Electoral Act 2017 (NSW)</i>
Electoral Commission	New South Wales Electoral Commission
Electoral Commission agency	New South Wales Electoral Commission staff agency
Electoral Commissioner	Electoral Commissioner for New South Wales
GIPA Act	<i>Government Information (Public Access) Act 2009 (NSW)</i>
NCAT	New South Wales Civil and Administrative Tribunal
PIIP Act	<i>Privacy and Personal Information Protection Act 1998 (NSW)</i>

Definitions

Term	Definition
Absent special elector	A vote cast by a special elector outside their enrolled electoral district.
Authorised roll	A roll of electors for an electoral district prepared by the Electoral Commissioner as soon as practicable after the issue of the writ for an election.
Election	A NSW state general election, state by-election or state referendum. A state general election is held in NSW every four years. A by-election is held when there is a vacancy in the Legislative Assembly.
Electors	A person who is entitled to vote at a NSW state general election or by-election.
Electoral Commission	<p>The statutory body consisting of three members who are appointed by the NSW Governor: a former judge as Chairperson, the Electoral Commissioner and a person with financial and audit skills and qualifications.</p> <p>The Electoral Commission is responsible for enforcing electoral, electoral funding and lobbying laws in NSW.</p>
Electoral Commission agency	<p>The NSW Public Service agency where staff are employed to enable the Electoral Commission and Electoral Commissioner to exercise their statutory functions.</p> <p>The Electoral Commission and Electoral Commissioner may delegate functions to members of staff of the Electoral Commission agency.</p>
Electoral Commissioner	Is appointed by the NSW Governor and is responsible for, amongst other things, the conduct of NSW State elections, dealing with the enrolment of electors and the maintenance of the Electoral Information Register and preparing authorised rolls of electors for elections.
Electoral Information Register	A register where the Electoral Commissioner keeps and maintains records of all persons enrolled under the Electoral Act.
Multiple voter	A person who votes at a NSW state election, state by-election or state referendum more than once.

Term	Definition
Multiple voting	The offence of voting more than once at a state election, state by-election or state referendum.
NCAT	The NSW Civil and Administrative Tribunal is a NSW government tribunal whose work includes reviewing a range of government administrative decisions.
Scrutineer	A person appointed by a registered party or candidate to observe processes at a voting centre or ballot counting location.
Special elector	A person declared by the Electoral Commissioner as a “special elector” due to: <ul style="list-style-type: none"> • that person being convicted of the offence of multiple voting, or • the Electoral Commissioner having reasonable grounds to suspect that the person has voted more than once at an election.
Voting centre	A place where an elector can cast their vote either on election day or during the early voting period.

2. Introduction

- 2.1. The Electoral Commissioner’s responsibilities include the administration of elections and the maintenance of enrolment information of electors.
- 2.2. It is unlawful for a person to vote more than once at an election¹. Enforcement action may be undertaken by the Electoral Commission in accordance with the [Compliance and Enforcement Policy](#).
- 2.3. Additionally, the Electoral Commissioner is authorised to declare a person as a special elector if the person is an elector and is convicted of multiple voting at an election, or if the Electoral Commissioner has reasonable grounds to suspect the elector of multiple voting at an election².
- 2.4. Special voting requirements are imposed on an elector who is declared as a special elector. The restrictions are intended to:
 - assist electors who have been convicted of multiple voting, or who the Electoral Commissioner has reasonable grounds to suspect of multiple voting, to not commit that offence at subsequent elections,
 - facilitate the prosecution of an elector who is a multiple voter after being declared as a special elector, and
 - support existing electoral integrity measures under NSW electoral laws.

¹ Refer to [section 212\(1\)\(b\) of the Electoral Act 2017 \(NSW\)](#)

² Refer to [Schedule 6 of the Electoral Act 2017 \(NSW\)](#)

- 2.5. This policy sets out the framework for decisions made by the Electoral Commissioner to declare an elector as a special elector, the actions taken following a declaration, and the way complaints about declarations may be made and dealt with.
 - 2.6. The work of the Electoral Commissioner is supported by members of staff of the Electoral Commission agency, who perform tasks on behalf of, and provide recommendations to, the Electoral Commissioner related to the legislative functions outlined in this policy.
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3. Purpose

- 3.1. The purpose of this policy is to support and guide the administration of NSW electoral laws as they relate to the declaration of an elector as a special elector by providing a guide to:
 - the circumstances under which the Electoral Commissioner may declare an elector to be a special elector,
 - reasonable grounds on which the Electoral Commissioner may suspect that an elector is a multiple voter,
 - factors that the Electoral Commissioner may consider in deciding whether to declare an elector to be a special elector, and
 - the framework by which complaints about declarations may be made and dealt with.
 - 3.2. Additionally, the effects of the Electoral Commissioner declaring an elector as a special elector are outlined in this policy.
 - 3.3. This policy will be implemented consistently, however, the Electoral Commissioner is not bound by this policy when the merits of a particular case justify a different approach.
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4. Scope

- 4.1. This policy applies to:
 - declarations by the Electoral Commissioner that an elector is a special elector, and
 - complaints about declarations made based on the Electoral Commissioner having reasonable grounds to suspect that an elector is a multiple voter, including how complaints are made and dealt with.
- 4.2. This policy does not apply to:
 - the offence of impersonating any elector for the purpose of voting at an election,
 - multiple voting at an election held prior to the 2019 NSW state general election,
 - enforcement actions taken with regard to impersonation and multiple voting offences in accordance with the [Compliance and Enforcement Policy](#), and
 - actions taken to give effect to a declaration by marking the name of a special elector on any authorised roll or list of electors, or the arrangements in a voting centre for special electors who are voting.

5. Policy

Circumstances enabling a declaration

- 5.1. The Electoral Commissioner may, by order, declare an elector is a special elector if:
- the elector has been convicted of the offence of multiple voting, or
 - the Electoral Commissioner has reasonable grounds to suspect the elector has voted more than once at an election whether or not the elector has been convicted of the offence of multiple voting.
- 5.2. In cases where both of the above circumstances apply the Electoral Commissioner will consider the particulars of each case before proceeding to take action on the basis that the elector has been convicted of the offence of multiple voting or on the basis that the Electoral Commissioner has reasonable grounds to suspect the elector has voted more than once. A matter that may be taken into consideration by the Electoral Commissioner (or an officer of the Electoral Commission agency making a recommendation) is the period of time that will lapse between identifying a suspected multiple voter and the prosecution of that elector, particularly when there is an upcoming election.

Declaration where an elector is convicted of multiple voting

- 5.3. If an elector has been convicted of the offence of multiple voting, there is no requirement for the Electoral Commissioner to be satisfied that there are reasonable grounds that the elector has voted multiple times in order to declare that elector as a special elector – this is because a conviction itself means that the court was satisfied (beyond reasonable doubt) that the elector voted more than once.

Notice of intention

- 5.4. Where an elector has been convicted of the offence of multiple voting the Electoral Commissioner will notify the elector of the Electoral Commissioner's intention to declare that the elector is a special elector. The notice of intention will set out the following:
- the reason for the intended declaration,
 - the relevant legislative provisions authorising the Electoral Commissioner to make such a declaration,
 - the proposed length of time the declaration will have effect (see also paragraph 5.51),
 - the effect of the declaration,
 - details to enable the elector to obtain additional information from the Electoral Commissioner,
 - an invitation to make submissions to the Electoral Commissioner within a reasonable timeframe, and
 - when the elector may expect a response from the Electoral Commissioner together with an assurance that cause for delay will be communicated to the elector.
- 5.5. The timeframes in the notice of intention may be impacted by an upcoming election at which the elector may be voting and the need to ensure safeguards are in place prior to that election.

- 5.6. The purpose of the notice of intention to declare the elector as a special elector is to:
- ascertain whether the elector intends to appeal the decision of the court, and if so, the nature of the appeal,
 - determine whether there exists any risk factors that would indicate that the elector will repeat the offence at another election,
 - determine the appropriate length of time the declaration should be in place,
 - determine whether making a declaration that the elector is a special elector is appropriate and reasonable in the circumstances.

Making a decision about a declaration

- 5.7. It may be that the elector requires additional time to respond to the Electoral Commissioner, in which case an extension may be provided.
- 5.8. Only relevant information will be considered when making a decision (see also paragraph 5.52).
- 5.9. The Electoral Commissioner will make a decision whether or not to declare an elector as a special elector, within a reasonable period of time after receiving an initial response from the elector.
- 5.10. It is also open to the Electoral Commissioner to delay making a decision until after the outcome of an appeal. Any cause for delay will be communicated to the elector.
- 5.11. An upcoming election may have an impact on timing.
- 5.12. The Electoral Commissioner may also decide not to proceed with a declaration.
- 5.13. The Electoral Commissioner will inform the elector of the outcome of a decision as soon as reasonably possible after that decision is made.

Making a declaration

- 5.14. If the Electoral Commissioner makes a decision to declare that an elector is a special elector, the Electoral Commissioner will notify the elector of the declaration in writing. The notice will include a copy of the order and set out:
- the reason for the declaration,
 - the relevant legislative provisions under which the declaration is made,
 - the length of time the declaration will have effect,
 - the effect of the declaration, and
 - information about how the elector can obtain additional information.
- 5.15. If an elector is declared as a special elector due to the elector being convicted of the multiple voting offence, a record of the declaration will be made in an approved records management system of the Electoral Commission. If the conviction is quashed on appeal the declaration ceases to have effect. However, the Electoral Commissioner may then consider if there are reasonable grounds to suspect the elector did vote at the election more than once and whether a declaration should be made on this basis.

Complaints

- 5.16. An elector who has been declared as a special elector, in circumstances where the elector has been convicted of the offence of multiple voting, cannot use the complaint process outlined below at paragraphs 5.32 – 5.43 that is available where a declaration is made based on the reasonable suspicion of the Electoral Commissioner that an elector has voted more than once. In addition, the NCAT has no jurisdiction to review the Electoral Commissioner's decision to make such a declaration.
- 5.17. The elector may make a complaint via the Electoral Commission agency's usual complaint avenues as detailed in the [Complaints Management Policy](#). It is also open to the elector to make a complaint to the NSW Ombudsman or seek an order from a court with respect to a decision of the Electoral Commissioner.

Declaration where an elector is suspected of multiple voting

- 5.18. The Electoral Commissioner may have reasonable grounds to suspect an elector has voted more than once if:
- the elector's name has been marked off more than once for voting purposes in respect of an election irrespective of the method of voting, or
 - the Electoral Commissioner receives information obtained through any of the compliance monitoring tools outlined in the [Compliance and Enforcement Policy](#) that supports the suspicion that the elector is a multiple voter.

Checking the authorised roll

- 5.19. The Electoral Commissioner will ensure a rigorous checking process is undertaken to establish a list of electors marked as having voted more than once or more at an election.

Initial communication with suspected multiple voter

- 5.20. Before the Electoral Commissioner makes an order declaring an elector as a special elector, due to there being reasonable grounds to suspect the elector is a multiple voter, the Electoral Commissioner will write to the elector for the purpose of informing the elector of the suspected multiple voting at an election. The letter will include the following:
- the name of the election at which the suspected multiple voting took place,
 - the locations where the elector was marked-off as having voted and/or the methods of voting,
 - the dates the elector was marked-off as having voted,
 - the details about relevant laws related to multiple voting,
 - a statement that a declaration may be made that they are a special elector and the effect of such a declaration,
 - details of the elector's right to a review if a declaration is made,
 - an invitation to provide a response with respect to the suspected multiple voting within a reasonable timeframe, and providing a channel through which the elector may provide an explanation,
 - advice that the elector is not obliged to respond to the letter,
 - advice that any information the elector provides the Electoral Commissioner in response to the letter may also be used as evidence with respect to the offence of multiple voting at a state or local government election, and
 - when the elector may expect a response from the Electoral Commissioner together with an assurance that cause for delay will be communicated to the elector.

- 5.21. A letter outlined in paragraph 5.20 is not required to be sent to an elector where the Electoral Commissioner does not consider making a declaration due to apparent reasons or extenuating circumstances affecting an elector or class of electors. This may include where an elector has made a statutory declaration while voting where their name has already been marked on an authorised roll as having voted or when it is clear on the basis of the information available that a recommendation by a member of staff of the Electoral Commission agency should not be put to the Electoral Commissioner to consider making a declaration.
- 5.22. An elector who is written to will be given 4 weeks to provide a response and the Electoral Commissioner may consider the response, if received, in deciding whether to declare the elector as a special elector. It may be that the elector requires an extension of time that is reasonable in the circumstances of the elector.
- 5.23. The timeframes stipulated in the letter may be impacted by an upcoming election at which the elector may be voting and the need to ensure safeguards are in place prior to that particular election.
- 5.24. If there is no response by the elector after the due date stipulated in the letter, the Electoral Commissioner will consider alternate means of communication. If all reasonable efforts to contact the elector have been exhausted and the elector has not responded, it is a matter for the Electoral Commissioner to be satisfied that there exists reasonable grounds to suspect the elector has voted more than once at an election based on the information available.

Considerations prior to making a declaration

- 5.25. The Electoral Commissioner will make a decision to declare an elector as a special elector within a reasonable period of time, taking into account the information available to the Electoral Commissioner about the suspected multiple voting by an elector and the timing of an upcoming election at which the elector may vote. Any cause for delay in making a decision about a declaration will be communicated to the elector.
- 5.26. Only relevant information will be considered when making a decision (see also paragraph 5.52). Factors that may be considered by the Electoral Commissioner in deciding whether to declare an elector as a special elector due to the Electoral Commissioner having reasonable grounds to suspect the elector is a multiple voter include:
- the information, if any, provided by the elector in response to the initial communication that may or may not support the appropriateness of a declaration in the particular circumstances, including any admission made by the elector without a reasonable excuse,
 - factors external to the elector that may have contributed to the elector's suspected multiple voting e.g. a delay in a postal ballot paper being returned to the Electoral Commissioner or technical issues with electronic voting methods that are outside the control of the elector,
 - the rigorous checking of the scanned list of electors,
 - the number of times the elector has been marked-off the authorised roll for a particular election,
 - whether criminal proceedings for the offence of multiple voting are currently before a court,
 - whether the elector has been suspected of multiple voting previously (at state or local government elections),
 - whether or not the elector has previously been declared as a special elector,
 - any other relevant evidence obtained through appropriate investigations supporting the suspicion that the elector is a multiple voter, and
 - any mitigating or aggravating factors that may be considered in the selection of an enforcement action in accordance with the [Compliance and Enforcement Policy](#).

- 5.27. The declaration of an elector as a special elector is not contingent on, and does not necessitate or preclude, pursuing enforcement actions in accordance with the [Compliance and Enforcement Policy](#).
- 5.28. If the Electoral Commissioner has reasonable grounds to suspect an elector is a multiple voter but does not declare the elector as a special elector, the Electoral Commissioner may provide the elector with educational material about relevant laws related to multiple voting.
- 5.29. If the Electoral Commissioner decides not to make an order declaring an elector as a special elector, the elector will be notified of such as soon as reasonably practicable.

Making a declaration

- 5.30. An order declaring an elector as a special elector, in circumstances where the Electoral Commissioner has reasonable grounds to suspect that the elector has voted more than once at an election, will be in writing and notify the elector of the declaration and its effect. Written notification to the elector will be undertaken within 10 business days of the declaration being made, with any cause for delay being communicated to the elector. The order will be accompanied with a notice setting out the following:
- the reason for the declaration,
 - the relevant legislative provisions,
 - the length of time the declaration will have effect (see also paragraph 5.51),
 - the effect of the declaration,
 - the elector's right to make a complaint about the declaration,
 - details of any upcoming election at which the elector is entitled to vote to enable the elector to make an informed decision about when to make a complaint,
 - attach a copy of the approved form the elector must use to make a complaint,
 - other details to enable the elector to obtain additional information.
- 5.31. A record of the declaration will be kept in an approved records management system of the Electoral Commission agency. Staff of the Electoral Commission agency support the Electoral Commissioner in applying the effects of the declaration at future elections.

Complaints about declarations

- 5.32. An elector may make a complaint to the Electoral Commissioner with regard to a declaration made based on the Electoral Commissioner having reasonable grounds to suspect an elector of multiple voting.
- 5.33. There is no time limit for making a complaint. The complaint could be made in response to a recent declaration or a declaration that has been in place for a number of years. For example, where an elector is of the view that the order has been in place long enough or where the order is still in place despite its expiration.
- 5.34. A complaint made by an elector must:
- be made in writing in the approved form. The elector should refer to the Electoral Commission agency's [website](#) for the current approved form,
 - be signed by the elector, and
 - set out the grounds of the complaint.

- 5.35. When the Electoral Commissioner receives a complaint, the Electoral Commissioner will ascertain whether the complaint has been made by an elector declared as a special elector on the basis of a reasonable suspicion that the elector voted more than once at an election and, if so, acknowledge receipt of such as soon as practicable after the complaint is received³.
- 5.36. If the complaint does not meet the requirements in paragraph 5.34, a member of staff of the Electoral Commission agency will provide assistance, so far as it is reasonable, to assist an elector to make a valid complaint.
- 5.37. If there is an upcoming election at which the elector is entitled to vote the elector will be promptly notified if the complaint cannot be dealt with prior to the printing of an authorised roll for the election or if the authorised rolls have already been printed for the election.

Dealing with complaints

- 5.38. The Electoral Commissioner will deal with a complaint regarding a declaration made based on the Electoral Commissioner having reasonable grounds to suspect an elector is a multiple voter. If the Electoral Commissioner has delegated this function to a member of staff, the delegated officer should, as far as is practicable, be an individual who was not substantially involved in the process of making a recommendation to the Electoral Commissioner that the elector be declared a special elector, and who is otherwise suitably qualified to deal with the issues raised in the complaint.
- 5.39. After dealing with the complaint (including any relevant material submitted by the complainant), the Electoral Commissioner may:
- revoke the declaration, or
 - refuse to revoke the declaration.
- 5.40. The Electoral Commissioner will give the complainant written notice of the decision to revoke or refuse to revoke the declaration, the reasons for the decision and details about the complainant's right to an external review of the Electoral Commissioner's decision.
- 5.41. The Electoral Commissioner may exclude information from its reasons for the decision if the Electoral Commissioner is satisfied that there is an overriding public interest against the disclosure of the information as outlined in the Electoral Commission agency's [Government Information \(Public Access\) Act 2009 Policy and Procedures](#).
- 5.42. The Electoral Commissioner will aim to make a decision to either revoke or refuse to revoke the declaration within 1 month of receiving a valid complaint. A special elector will be informed if there are any delays and where possible, the reasons for those delays.

Review of decisions following investigation of complaints

- 5.43. An elector who has made a complaint regarding a declaration based on the Electoral Commissioner having reasonable grounds to suspect an elector is a multiple voter may apply to NCAT for an administrative review of the decision of the Electoral Commissioner with regard to the complaint.
- 5.44. It is also open to the elector to make a complaint to the NSW Ombudsman.

³ A complaint made by an elector that has been declared a special elector on the basis of being convicted of the offence of multiple voting will be dealt with in accordance with the [Complaints Management Policy](#) rather than the procedure outlined in paragraphs 5.32 to 5.43.

Effects of declaration

- 5.45. The Electoral Commissioner will ensure that the name of a special elector on an authorised roll that is to be used at a voting centre is marked to show that the elector is a special elector.
- 5.46. This mark **only** applies to the authorised roll to be used at a voting centre (including an early voting centre) at a state election, state by-election or state referendum.
- 5.47. The mark will not be included on a list of electors for a local government election, a list of electors that the Electoral Commissioner is required to make publicly available or a list of electors that the Electoral Commissioner is either authorised or required to provide to political participants⁴ or other persons under our governing legislation.
- 5.48. The special elector's name will continue to appear on an authorised roll but an additional mark will appear against that elector's name that alerts voting centre staff that the elector is a "special elector".
- 5.49. Additional voting measures applicable to "special electors" only apply when voting in person at a voting centre (including an early voting centre). Additional voting measures do not apply to postal voting or telephone/internet voting.
- 5.50. If a special elector attends a voting centre, the elector is permitted to vote subject to additional voting measures being satisfied, which include:
- applying to an election official to vote as a special elector or as an absent special elector at a voting centre,
 - providing to an election official the special elector's name, date of birth, and electoral district for which the special elector claims to be enrolled,
 - providing answers to any additional questions made by an election official (questions may also be asked by an election official at the request of a scrutineer), and
 - making a declaration before an election official at the voting centre.

Determining length of order

- 5.51. The appropriate length of time a declaration that an elector is a special elector is to remain in place may be influenced by a number of factors, for example:
- whether the elector has expressed remorse,
 - whether the elector has threatened to repeat the offence,
 - the number of votes made at a single electoral event,
 - whether the elector votes multiple times at other electoral events,
 - the age and maturity of the elector,
 - submissions made by the elector or the elector's doctor concerning the cognitive capacity of the elector and the remedial benefits of an order.

⁴ Political participants include political parties registered for state elections, members of the NSW Parliament and candidates

Irrelevant considerations

- 5.52. Only relevant considerations will be taken into account. The following are examples of irrelevant considerations that will not be considered when making a decision about a declaration that an elector is a special elector:
- the race, religion, sex, national origin, social affiliation or political associations, activities or beliefs of the elector (unless they have special significance in relation to the commission of the particular offence or should otherwise be taken into account objectively),
 - the personal feelings of the decision maker concerning the offence and the alleged offender,
 - the possible political advantage or disadvantage to the government or any political party, group or individual,
 - the possible effect of the decision on the personal or professional circumstances of those responsible for making the decision or otherwise involved in its conduct, and
 - possible media or community reaction to the decision.

Privacy considerations

- 5.53. The Electoral Commissioner and staff of the Electoral Commission agency will collect or be provided with personal information and/or health information of an elector.
- 5.54. All staff of the Electoral Commission agency are required to understand and comply with NSW privacy laws when dealing with personal information of an elector. These requirements are discussed in general terms in the Electoral Commission agency's Privacy Management Plan.
- 5.55. Privacy considerations in relation to making decisions about special electors and dealing with complaints include:
- when an elector is invited to provide additional information, staff of the Electoral Commission agency must ensure that the information sought is not excessive and does not unreasonably intrude into the personal affairs of the individual,
 - when a letter is sent to an elector, staff of the Electoral Commission agency must take reasonable steps to ensure that the information included in the letter is accurate. For example, the correct date of birth, name, and address of the elector,
 - when answering telephone calls or responding to correspondence, staff of the Electoral Commission agency must take reasonable steps to verify that they are talking to or corresponding with the individual concerned,
 - all records kept by the Electoral Commission agency that contain personal information and/or health information of an elector must be protected by taking such security safeguards as are reasonable in the circumstances, against loss, unauthorised access, use, modification or disclosure, and against all other misuse.
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6. Relevant legislation

Relevant legislation can be found on the [NSW legislation website](#) and includes:

- *Administrative Decisions Review Act 1997* (NSW),
- *Civil and Administrative Tribunal Act 2013* (NSW),
- *Constitution Further Amendment (Referendum) Act 1930* (NSW),
- *Electoral Act 2017* (NSW),
- *Government Information (Public Access) Act 2009* (NSW),
- *Ombudsman Act 1974* (NSW),
- *Privacy and Personal Information Protection Act 1998* (NSW).

7. Roles and responsibilities in relation to this policy

Who	How
Electoral Commissioner	<ul style="list-style-type: none">• Approves this policy and associated documents
Executive Director Funding, Disclosure and Compliance Director, Legal Director, Compliance	<ul style="list-style-type: none">• Participates in the consultation process• Determines policy instrument content and compliance with electoral laws
Manager, Governance	<ul style="list-style-type: none">• Coordinates administration of the policy development and review process• Manages the publication, amendment or archiving of approved policy instruments in the Policy Library
Senior Advisor, Regulatory Advice and Analysis Policy and Project Officer	<ul style="list-style-type: none">• Develops and amends policy instruments as required• Forwards approved policy instruments to the Policy Coordinator for registration and publication• Forwards approved policy instruments to the Policy Implementer (if not also the Policy Author) for implementation

8. Monitoring, evaluation and review of this policy

This policy must be reviewed every three years by the Client Experience Regulatory Services Unit, or whenever it becomes apparent that a revision is needed.

9. Associated documents

Associated documents and additional resources are available [on our website](#) and include:

- Complaints Handling Policy
- Compliance and Enforcement Policy
- Compliance and Enforcement Procedures
- *Government Information (Public Access) Act 2009* Policy and Procedures
- Privacy Management Plan.

10. Document control

Document management

Approved by:	Signature:	Date approved:
John Schmidt Electoral Commissioner	Signature redacted	22/12/20
Executive Director Review:	Signature:	Date reviewed:
Rachel McCallum Executive Director, Funding, Disclosure and Compliance, and General Counsel	Signature redacted	21/12/20
Director Review:	Signature:	Date reviewed:
Hugo Bergeron Director, Compliance	Signature redacted	16/12/20
Monica Richmond Director, Legal	Signature redacted	16/12/20

Publication details

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Responsible Business Unit: Client Experience Regulatory Services	Author: Policy and Project Officer	Publication: <input type="checkbox"/> Not for publication <input type="checkbox"/> Internal catalogue <input type="checkbox"/> Intranet only <input checked="" type="checkbox"/> Intranet and website

Review record

Date	Version	Revision description
22/12/2020	V 1.0	New policy approved