

GREATER **LONDON** AUTHORITY

Request for Greater London Returning Officer (GLRO) Decision – GLRO 028-01

Title: GLA Elections 2028 E-Counting Procurement

Executive Summary:

To ensure robust and timely preparation and planning for the 2028 London Mayoral and Assembly elections, and in order to maintain the possibility of conducting an e-count (the final decision on count modality has yet to be made), approval is sought from the Greater London Returning Officer (GLRO) to commence procurement activity to source electronic counting supplies and services.

Decision:

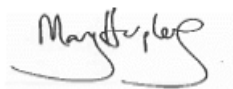
1. The GLRO approves the commencement of a procurement exercise for systems and services required for the electronic counting of votes cast in the 2028 London Mayoral and Assembly elections (and potentially the 2032 elections)
2. The GLRO approves up to £45,000 expenditure to permit the conduct of the procurement process.

Greater London Returning Officer

The above request has my approval.

Date: 26 September 2025

Signature:



PART I - NON-CONFIDENTIAL FACTS AND ADVICE

1. Introduction and background

- 1.1. The next set of ordinary elections for the Mayor of London and the London Assembly (together “GLA elections”) will be on Thursday 4 May 2028. In order to provide the GLA the opportunity to conduct the count of these elections by means of an electronic vote count (e-count), if it ultimately chooses to do so, a procurement exercise must be undertaken.
- 1.2. With the exception of the 2024 GLA elections, prior GLA elections have been conducted with the use of an e-count system provided to Constituency Returning Officers (CROs) by the Greater London Returning Officer (GLRO) consisting of computer hardware, software and other equipment or services, for the purpose of counting the number of ballot papers, to verify the ballot paper accounts and to count the votes cast. The contracts for this service historically also included the provision of ballot papers and ballot boxes. The success of the 2021 e-count and the 2024 manual count have demonstrated that either count method is viable, however each comes with different benefits, risks and considerations.
- 1.3. The English Devolution and Community Empowerment Bill (the Bill), published in July 2025, has proposed a change in the law to replace the first past the post (“FPTP”) system for the Mayoral election with the Supplementary Vote (“SV”)¹. Due to the greater complexity of counting first and second preference votes on a single ballot paper, an e-count may be chosen as the method for counting all three 2028 GLA election contests: the Mayoralty, Constituency and London-wide Assembly members. As such, the GLRO is asked to approve the commencement of a procurement exercise for systems and services that would be required for the e-counting of votes cast for the 2028 and 2032 GLA elections. Should no tender prove satisfactory in terms of quality and/or affordability, the changes proposed in the Bill not progress or in the event that there is after all a decision to conduct a manual count, a contract will not be awarded.
- 1.4. It is likely that the unit cost of e-counting the GLA elections could be reduced by contracting for more than a single event and, so the proposal is to seek tenders for two sets of elections (2028 and 2032) subject to conditions which include a break clause, the application of lessons learned from 2028 and the incorporation of any new or revised statutory provisions coming into force between the two elections.

2. Objectives and expected outcomes

- 2.1. Procurement of a supplier for the 2028, and potentially 2032, GLA elections to:
 - provide the goods and services required to conduct an e-count, complying at all times with all applicable statutory requirements in relation to the conduct and delivery of the 2028 GLA elections
 - procure and deliver required ballot boxes, seals and ballot papers
 - train GLA and London borough staff on the use of the solution and process, to a sufficient level
 - provide fully trained staff on the management and maintenance of the solution
 - provide fully trained staff to conduct scanning activities for all ballots
 - sufficiently test the services and the solution to enable the GLA to have confidence in the services
 - collect all data from boroughs as required to provide the specified high standards of data transfer and security, with intuitive interfaces designed through user consultation.

¹ Schedule 26 makes provision for the use of the supplementary vote system in elections of mayors and police and crime commissioners. See <https://publications.parliament.uk/pa/bills/cbill/59-01/0283/240283.pdf>

3. Other considerations

Key risks and issues

- 3.1. A final decision has not yet been taken with regards to the count method for 2028, and the option of a manual count remains viable, as occurred in 2024 (though under a different electoral system, without the SV). In the event of unforeseen circumstances, or an exceptional series of events, the GLRO may also determine that a manual count should be conducted, negating the need for an e-count.
- 3.2. E-counting has been used at all prior GLA elections where the supplementary vote electoral system has been in place. It is a tried and tested method and thereby provides assurance that it will deliver. However, the e-count system will first need to be set-up, and devices built, staff will need training, and the full e-counting process thoroughly tested prior to May 2028 to ensure reliability.
- 3.3. Risks to the conduct of an e-count include the potential for the count location to become unavailable or otherwise unusable, for the count day to be postponed, for technical failures, or cybersecurity concerns, all of which could result in delays to the count, reputational damage and legal challenge. As a result, technical and operational actions are required to mitigate these risks, which will be delivered through the design, planning and management of the count.
- 3.4. A combined 2028 London and UK Parliamentary General Election is possible, and 2028 planning will include contingency for this scenario. However, the procurement will be costed primarily on the scenario of stand-alone GLA elections.
- 3.5. Further risks will be identified and mitigated through the elections working groups, by supplier and stakeholder engagement, and by ensuring the procurement takes place sufficiently early to allow maximum time for partnership working and repeated testing of the system May 2028.
- 3.6. London Elects² will take all steps necessary to ensure that quality assurance and repeated testing are paramount in any future e-count contract.

4. Equality comments

- 4.1. Under section 149 of the Equality Act 2010, as a public authority the GLRO must comply with the public sector equality duty and have due regard to the need to: eliminate discrimination, harassment and victimisation, and any conduct that is prohibited by or under the Equality Act; and advance equality of opportunity, and foster good relations between people who share a protected characteristic and those who do not. Largely, the services described are internally facing, limiting any impact on those with protected characteristics. However, bidders for the service will be required to adhere to the various statutory provisions related to equalities and the specification will take account of any relevant needs of any groups with protected characteristics.

5. Financial comments

- 5.1. The GLRO is invited to approve an e-counting procurement exercise. The GLRO is not at this stage asked to approve expenditure on e-counting services (for which a further decision will be required).
- 5.2. This decision requires approval for up to £45,000 of financial expenditure for the conduct of the procurement process to accommodate legal advice. This expenditure will be funded from the election reserves.
- 5.3. If further expenditure for external services or other expenditure is required to support the procurement and contracting exercise, then approval will be required via a separate decision form.
- 5.4. It is anticipated that any future expenditure will be met within the elections budget and/or election reserves.

² The GLRO is supported by the 'London Elects' team comprising GLA officers. Duties include planning the method of the count, designing, printing ballot papers and polling station materials, a public awareness campaign.

6. Legal comments

- 6.1. The proposed expenditure is necessary for the purpose of enabling the GLRO to carry out their statutory functions and for the smooth running of the elections.

7. Planned delivery approach and next steps

Activity	Date
Procurement Commence	25 October 2025
Contract Issue	1 May 2026
Kick-Off	15 May 2026
Polling Day	4 May 2028
Count Start	5 May 2028

Appendices and supporting papers:

None

Public access to information

Although the GLRO is not subject to the Freedom of Information Act 2000 (FOI Act), the information in this form will be published on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it will be deferred until a specific date. Deferral periods will be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after approval or on the defer date.

Part 1 Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 Confidentiality:

Only the facts or advice whose publication may be prejudicial or commercially sensitive should be in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

Ajay Patel has drafted this report in accordance with GLA procedures and confirms that:

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Deputy GLRO officer:

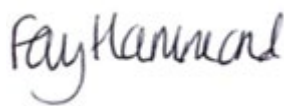
Alex Conway has reviewed the request and is satisfied that it is correct and can be referred to the GLRO for approval.

✓

Chief Finance Officer:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:



Date: 27 October 2025