

Request for Greater London Returning Officer (GLRO) Decision – GLRO 2028-04

Title: GLA Elections 2028 – User-testing of ballot paper designs

Executive Summary:

This decision requests approval for expenditure to undertake user-testing and market research of potential ballot paper designs and instructions to be used in the 2028 elections for the Mayor of London and London Assembly.

Decision:

That the Greater London Returning Officer approves:

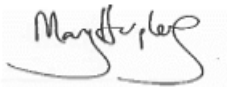
- Expenditure of up to £50,000 for qualitative testing of ballot papers, instructions to voters and polling station voting.
- Commissioning the GLA's corporate market research contractor to undertake this work with assistance from the GLA's Opinion Research team.

The total of £50,000 expenditure has been provided for within the Elections reserve in 2026-27.

Greater London Returning Officer

The above request has my approval.

Signature:



Date: 23 March 2026

PART I - NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. 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”). If enacted, this would mean the 2028 GLA elections will see a return to the SV system for the mayoral contest and (as of March 2026) an electronic count is being considered. These changes from the 2024 elections will necessitate a different ballot paper format, within the requirements of the legislation. The last elections that were counted electronically and used the supplementary vote system were in 2021; and saw a record number of rejected ballot papers. The ballot paper format was considered the primary reason for this, as referenced in the London Assembly’s review of the 2021 elections¹.
- 1.2. The ballot paper format and associated instructions and voting processes are therefore an area of high risk. It is important that voters understand the ballot paper and the instructions, and that polling station staff and processes assist in enabling people to vote; to prevent unintended errors that lead to rejected votes.
- 1.3. Electronic counting adds further complications to the format and size of ballot papers. The electronic counting system involves scanning all ballot papers for the purpose of counting the number of ballot papers, to verify the ballot paper accounts and to count the votes cast on them. The size and format of the ballot papers will be limited by the technical requirements of the scanning software and hardware. Where the counting software is unable to determine the vote(s) written on a ballot paper, observers must be able to watch the manual process of the above. These requirements will impact the design and format of the ballot papers.
- 1.4. In 2021 the ballot paper for the mayoral contest was divided into two columns of candidates. This was because of the unexpected record number of twenty candidates². The double-column ballot paper was considered the primary reason for the high number of rejected ballots in that election as noted in paragraph 1.1 above. The Greater London Returning Officer (GLRO) is clear that this situation must not be repeated in 2028 and, instead, a single column ballot paper should be used.
- 1.5. The Greater London Authority Election Rules 2007 (“the Rules”) prescribe the specifications for the ballot papers. However, Schedule 10, paragraph 1 of the Rules provides that forms may be adapted by the GLRO so far as circumstances require (and in particular, for the purposes of electronic counting).
- 1.6. The GLRO has responsibility for delivering these elections, including the design and production of the ballot papers pursuant to the relevant Rules. Identifying and mitigating against risk is a requirement of the GLRO within the Electoral Commission’s performance standards. The GLRO has determined that market testing is required to provide analysis and confidence when making the decision on the final templates to be used for the ballot papers.
- 1.7. Different designs of ballot papers and instructions, covering scenarios with both a standard number of candidates and a high number of candidates will therefore be tested. The ballot papers and instructions will be subject to qualitative market research to ensure they are clear to voters.
- 1.8. The testing will be carried out by the GLA’s and TfL’s contracted research agency, 2CV Limited. The contract was entered into following a competitive procurement and enables other teams within the GLA to collaborate with the GLA’s Opinion Research team and instruct 2CV Limited to undertake market research pursuant to the services in their contract with the GLA. The GLA’s Opinion Research team provide oversight and expertise, ensuring the activity requested is aligned with the services under

¹ [The 2021 Mayor and London Assembly Elections](#)

² Due to the Local and Greater London Authority Elections (Coronavirus, Nomination of Candidates (Amendment) (England) Rules 2021 which amended the nomination process for the 2021 GLA elections only, reducing the number of electors required on a mayoral candidate’s nomination form.

the existing contract with 2CV Limited and complies with the GLA's corporate policies and requirements.

- 1.9. The testing proposal includes structured interviews across four sessions with 18-20 participants per session. Participants will be broadly representative of the local electorate for that polling district.
- 1.10. The sessions will replicate the experience of voting as closely as possible, asking participants to complete the papers as they would in a real election. We will work with four London boroughs and use actual polling places and voters who would normally attend those venues while meeting the appropriate representation.
- 1.11. Interviews will be subsequently conducted to establish whether respondents were able to cast their vote as they intended, and whether they found the ballot paper directions clear. Secondary information will be collected on how the polling station layout and processes were helpful and accessible. By doing this we aim to identify any factors that can assist voters to mark their ballot papers correctly.

2. Objectives and expected outcomes

- 2.1. The market research will explore reactions to the ballot papers, instructions and voting processes and identify any areas requiring improvement or optimisation. This activity will ensure the ballot papers are accessible for Londoners, promoting participation and equality.
- 2.2. 2CV will provide a report with feedback on the various ballot paper templates and instructions presented to the participants.
- 2.3. The market research will assist the decision of the GLRO on the 2028 ballot paper format.
- 2.4. The GLRO will have the evidence of the research and be able to explain the reasoning to stakeholders who have expressed interest and concern given the number of rejected ballots at the 2021 Mayoral election.
- 2.5. The GLRO will be able to satisfy the requirements of the Electoral Commission's performance standards by identifying a risk and making appropriate and proportionate mitigations.
- 2.6. The GLRO will be able to address the concerns of the London Assembly's Elections Review Working Group about the ballot paper format for 2028.

3. Other considerations

Key risks and issues

- 3.1. The GLRO's intention is to avoid a repeat of the high number of rejected ballots experienced in the 2021 elections. The GLRO and London Elects are taking steps to mitigate this risk and to provide confidence to stakeholders that appropriate measures are being taken, including the Electoral Commission, London Assembly, the Ministry of Housing, Communities and Local Government, political parties, candidates and voters.
- 3.2. Although a high number of candidates is less likely than in 2021 for the reasons provided earlier, we must still be prepared for this scenario and have a compliant ballot paper template that has been tested to cater for this.
- 3.3. The ballot paper template has a significant impact on the design and build of the electronic counting software and hardware. The electronic count supplier will require confirmation of the preferred ballot paper templates from the start of the contract, expected to be in July 2026. Market research should be completed in time for this to enable effective planning and development of the electronic count solution.
- 3.4. A second round of market research may be required as a result of unforeseen issues arising from our

engagement with the electronic count supplier. This will be built into the specifications for the market research company. The projected budget of £50,000 includes an amount for this second round of market research. In the event a second round of market research is required, and the remaining budget be insufficient, a new GLRO Decision will be submitted for consideration.

4. Equality comments

- 4.1. Under section 149 of the Equality Act 2010, as a public authority, the Mayor and GLA must comply with the Public Sector Equality Duty (PSED) when exercising GLA functions. The PSED is a duty to have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation, and any conduct that is prohibited by or under the Equality Act 2010
 - advance equality of opportunity, and foster good relations, between people who share a relevant 'protected characteristic' as defined in the Equality Act 2010 and those who do not
 - foster good relations between people who share a relevant protected characteristic and those who do not.
- 4.2. The 'protected characteristics' are: age, disability, gender re-assignment, pregnancy and maternity, marriage and civil partnership status (but only in respect of the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.
- 4.3. Consideration of the PSED is not a one-off task. The duty must be fulfilled before taking a decision, at the time of taking a decision, and after the decision has been taken, to ensure that equalities impacts are kept under ongoing review.
- 4.4. The market research will involve a range of potential voters as noted in section 1. Further consultation will be taking place in the election programme including work with experts on disability and voters who have accessibility requirements and the testing of equipment such as the tactile voting device and audio ballot papers. An Equality Impact Assessment will be completed which will inform the specifications of the ballot paper templates, instructions and polling station resources. This work will be separate to the market research and will influence the decision on ballot paper templates to be used at the election.
- 4.5. The ballot paper formats to be tested will follow the latest accessibility guidance for font size and style.

5. Financial comments

- 5.1. The decision approves expenditure of up to £50,000 for up to two rounds of market research of ballot papers, guidance and instructions. This amount will be funded from the Elections Reserve for 2026-27.

6. Legal comments

- 6.1. By section 29 of the Greater London Authority Act 1999 (the "Act"), the GLRO is the person appointed as the proper officer for the purposes of s 35 (2C) of the Representation of the People Act 1981 (RotPA) (returning officer at elections of the Mayor and London members). The Mayor and Assembly have appointed the Chief Officer as the GLRO as part of her terms and conditions of employment under s 70(2) of the Act.
- 6.2. The GLRO is the returning officer for the Mayoral and London Member elections, and constituency returning officers are the returning officers for the election of a Constituency Member of the

Assembly. The GLA must, under section 36(48) of RotPA, pay for all expenditure properly incurred by a returning officer in relation to the holding of a GLA election, in so far as it does not, in cases where there is a scale fixed by the GLA, exceed that scale.

- 6.3. The GLA's Scheme of Delegation enables the GLRO to incur expenditure for the purposes of the preparation or conduct of any anticipated election as she considers necessary or expedient for that purpose. The GLRO is also able to authorise entry into contracts, licences or other instruments, in connection with an anticipated election in accordance with the GLA's Contracts and Funding Code (the "Code") and Financial Regulations.
- 6.4. Paragraph 2 of Schedule 10 of the Rules prescribe directions as to printing the ballot papers but also provide that the ballot papers may be adapted so far as circumstances require (and in particular, for the purposes electronic counting).
- 6.5. Officers have indicated at paragraph 1.8 of this report that they are satisfied the services may be instructed by the GLA pursuant to an existing contract between the GLA and the supplier, and that the existing contract was procured in accordance with procurement law and the Code.
- 6.6. In taking the decision requested, the GLRO must have due regard to the Public Sector Equality Duty under section 149 of the Equality Act 2010. –To this end, the GLRO should have particular regard to section 4 of the report.

7. Planned delivery approach and next steps

7.1. The proposed timeline is as follows:

Date	Activity
April 2026	London Elects to prepare specification for testing; and Opinion Research team to confirm the proposal with the market research company
May-June 2026	Confirm venues and partner boroughs; recruitment of sample voters; fieldwork starts at the testing sites
July 2026	Final analysis and results shared with London Elects
August 2026	Determine if a second round of testing is required. Should that be the case the second round will begin immediately and will utilise the remaining budget.

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**

If YES, for what reason:

Until what date: (a date is required if deferring)

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:

Jamie Baker has drafted this report in accordance with GLA procedures and confirms that the Finance and Legal teams have commented on this proposal as required, and this decision reflects their comments.

✓

The **Deputy GLRO** 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:



pp on behalf of Fay Hammond

Date:

23 March 2026