

Request for Greater London Returning Officer (GLRO) Decision – GLRO28-07

GLA Elections 2028: Decision to conduct an e-count and the appointment of an e-count supplier

Executive summary:

The Mayor of London and London Assembly elections will take place on Thursday 4 May 2028. It is proposed that an electronic count (e-count) is used to count the ballots. A procurement for a supplier to provide an e-counting system, ballot papers and related technical services has been concluded, and a supplier has been selected. This decision seeks the approval of an e-count in principle; the supplier; and the associated expenditure under the e-count contract.

Decision:

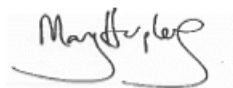
That the Greater London Returning Officer approves:

- using an e-count to count all ballots for the 2028 London Mayoral and Assembly elections.
- the award of the e-counting contract to CGI IT UK LIMITED for £12,078,080.
- up to £13,300,000 from the Election Reserve budget for the e-counting contract for the supply of:
 - an electronic ballot paper counting system
 - ballot papers and ballot boxes
 - associated supplies/services.

Greater London Returning Officer

The above request has my approval.

Signature:



Date: 10 July 2026

PART I – NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. The next set of ordinary elections for the Mayor of London and the London Assembly (together, the GLA elections) will be on Thursday 4 May 2028.
- 1.2. The English Devolution and Community Empowerment Act 2026 (the 2026 Act) received Royal Assent on 29 April 2026. It has replaced the first-past-the-post (FPTP) system for the Mayoral elections with the supplementary vote (SV) system. Every Mayoral election, apart from 2024, used the SV system and used an electronic count (e-count). This is due to the complexity of counting first and second-preference votes on a single ballot paper. The e-count has been used to count all three GLA election contests: the Mayoralty; Constituency Assembly Members; and London-wide Assembly Members.
- 1.3. The 2024 Mayoral election was based on the FPTP system, and a manual count was conducted for all three contests. Its success potentially indicates that a manual count could also be viable for an SV election, albeit with further complexity.

Overview of the e-count approach

- 1.4. An e-count is the preferred approach for the 2028 GLA elections count, for the following reasons:
 - There is no comparable example in the UK of an election with similar complexity and scale being counted manually. However, an e-count is a proven approach, having been used previously by the GLA.
 - Using the SV system for the Mayoral contest means counting second-preference votes – required unless one candidate has over 50 per cent of first-preference votes. A manual count is expected to need at least one day more than an e-count.
 - An e-count would significantly reduce the burden on the Constituency Returning Officers' (CROs') electoral services teams. This would, in turn, limit the risks associated with staff working over several days. A constituency would need to recruit and manage approximately 100 staff for an e-count, rather than 600 staff for a manual count. What's more, these staff would only be required for a single day – as opposed to three days for a manual count.
 - The e-count software would allow the Greater London Returning Officer (GLRO) to record, and make available, borough and ward-level data. There are various legal, technical, cost and resourcing barriers to providing similar data at a manual count. Even if these were surmountable, there would still be significant difficulties in capturing complete data on second-preference votes for the two leading candidates. It would be more difficult to do so for all candidates.
 - An e-count means the count can be conducted at one location (which is the intention). This would:
 - allow greater consistency
 - improve the opportunity for candidate, agent and observer scrutiny
 - make the GLRO and team more readily accessible, so they can provide leadership and direct support to the counts as required.
 - It is possible, with proper contingency planning, to accommodate a UK Parliamentary election (which must statutorily be held by August 2029 at the latest) on the same day as the GLA elections. A UK Parliamentary election would take priority.
 - The costs of a manual and e-count are comparable. This remains the case if there is a combined count due to a simultaneous UK Parliamentary election.

- 1.5. The GLRO will provide CROs with the computer hardware, software and other equipment and services, to count ballot papers – and so verify the ballot paper accounts and count the votes cast.

Procurement of an e-count supplier

- 1.6. Under GLRO decision 28-01 (September 2025), the GLRO approved a procurement exercise for the systems and services needed for an e-count at the 2028 elections. The procurement process was completed, and CGI IT UK LIMITED was the successful bidder. This decision seeks the GLRO's approval to appoint CGI IT UK LIMITED.
- 1.7. The e-count contract enables a rigorous process for quality assurance and information security. This gives full confidence that the technical system will operate as required in May 2028. The quality-assurance process will be similar to that in the 2021 GLA elections, which used an e-count. It will comprise:
 - a concerted testing process
 - independent cyber security testing
 - other technical risk mitigations.

The GLA has started engaging with the National Cyber Security Centre, to provide further assurance of the e-count. It is proposed to use the same e-count software as in previous e-counts, with upgrades – thus creating further assurance.

- 1.8. The contract includes an option to provide e-counting services for the 2032 election. A new GLRO decision would be sought after the 2028 election if the recommendation is to exercise the option.

2. Objectives and expected outcomes

- 2.1. The primary objective is to deliver an accurate, timely and secure e-count of votes cast in the 2028 GLA elections. The e-count system will be used to verify ballot paper accounts, and count votes cast across all three GLA election contests: the Mayoralty, Constituency Assembly Members and London-wide Assembly Members.
- 2.2. The expected outcomes of the appointment of the e-count supplier are:
 - the provision of 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
 - the provision of required ballot boxes, seals and ballot papers
 - training and support services, provided to help constituency count personnel manage and operate their counts
 - results that are available at borough and ward level for all three contests.

3. Other considerations:

Key risks and issues

- 3.1. A primary risk of counting votes electronically is that the software or equipment fails to accurately record and report the ballots cast by the London electorate. To mitigate this, there will be a thorough and repeated process of testing and quality assurance. This includes establishing a physical test centre in London to trial and refine the counting process from start to finish. CGI IT UK LIMITED and the GLA, have significant experience in e-counting that will benefit the testing process.

- 3.2. The possibility of a UK Parliamentary election also being called on 4 May 2028, when the government will have served nearly four years of its maximum five-year term, must be considered. This would lead to logistical challenges around the timing, transportation and condition of ballot papers for the e-count. Officers are making contingency plans for this possibility, noting a Parliamentary election could be announced with only six weeks' notice – meaning, as late as mid-March 2028.
- 3.3. In 2020, the GLA elections were postponed due to the COVID-19 pandemic, which incurred a very significant seven-figure total in sunk costs. This is because considerable work had already been undertaken to develop and test the e-count software; lease the hardware and three large venues; and train staff. These costs were met entirely by the GLA. Mitigations will be established to cater for other scenarios that might render an e-count impracticable at the planned time. Planning for a manual count will also be developed.
- 3.4. For all SV GLA elections before 2021, candidates on the Mayoral ballot paper were presented in a single column. For the 2021 GLA election, the ballot paper size was restricted to an A4 page. However, the final list of candidates could not fit into a single column, so candidates were presented in two columns. This contributed to some voters incorrectly completing their ballots, leading to a higher number of rejected ballots than in previous e-counts. To prevent an escalated error rate in 2028, all candidates on the Mayoral ballot paper will be presented in a single column. This contract provides for an e-count system that can accommodate a longer-format ballot paper, and testing of different ballot formats.
- 3.5. There remain some undefined factors in accommodating a longer ballot paper which may create extra costs, such as more paper needed to print longer ballots; different printing equipment; and larger ballot trays. Further, the e-count contract may require one or more contract variations, within the scope of the original procurement. Accordingly, this decision seeks approval for an additional 10% in excess of the contract value with the appointed e-count supplier to accommodate these potential variations, for which further GLRO Decisions will not be sought.

4. Equality comments

- 4.1. The GLRO has a duty, under the Equality Act 2010, to have due regard to the need to eliminate discrimination; advance equality of opportunity; and foster good relations between persons who share a relevant protected characteristic and those who do not.
- 4.2. The e-count hardware and software should be accessible for all users. The proposed supplier has confirmed that its solution has been designed to be accessible to all users, in accordance with the Equality Act 2010 and accessibility guidance from the Government Digital Service.
- 4.3. The choice of counting method does not directly affect the ability of electors to cast their vote. However, the following equality considerations are relevant:
 - Accessibility of the count for candidates, agents and observers: The GLRO will ensure that the count venue is fully accessible; and that reasonable adjustments are made for any participant with a disability.
 - Ballot paper design: The SV system requires a ballot paper that accommodates first and second-preference columns. The GLRO will work with the Electoral Commission, and relevant stakeholders, to provide an accessible ballot paper design.
 - Ward-level data: An e-count will make ward-level data available; and so support analysis of voter behaviour and participation across London's diverse communities. This can inform future efforts to improve electoral inclusion by academia, political parties and the government.

5. Financial comments

- 5.1. This decision seeks approval to award the contract for the provision of an e-counting system and the supply of ballot papers, ballot boxes and associated supplies and services, for the 2028 GLA elections. The quoted price of £12,078.080 will be met by the Elections Reserve budget.
- 5.2. The contract price includes all costs associated with the organisation, delivery and management of the project as outlined in the specification.
- 5.3. This decision allows for an additional 10%, up to £13.3 million, to cover currently additional potential costs.
- 5.4. There is an option to extend this contract to cover the 2032 elections. The budget allocation for this election has not yet been determined. However, it will call upon the GLA's Elections Reserve; and will be subject to future years' strategic planning and budget process.
- 5.5. All appropriate budget adjustments will be made.
- 5.6. The London Elects team, with the Finance and Governance team, will be responsible for monitoring the contract to ensure that milestones are met; and payments are made in line with agreed milestones.

6. Legal comments

- 6.1. Section 2(6) of the Greater London Authority Act 1999 (the GLA Act) provides that the Mayor and Assembly members shall be returned, in accordance with the provisions made in the Act for the holding of ordinary elections of the Mayor, Constituency Assembly Members and London Assembly Members.
- 6.2. Under section 29 of the Act, the GLRO is the person appointed as the proper officer for the purposes of section 35(2C) of the Representation of the People Act 1983 (returning officer at elections of the Mayor and London Assembly Members). The London Assembly has made the Head of Paid Service the GLRO, as part of the terms and conditions of her employment under section 70 (2) of the GLA Act.
- 6.3. Section 7 of the Mayoral Decision Making in the GLA document states:

"To preserve impartiality and independence, normally only the GLRO may exercise Mayoral Powers under the General Delegation in support of:

- their functions as GLRO under the GLA Act and/or
- as Proper Officer under the Representation of the People Acts and elections law generally (i.e. to prepare and conduct Mayor of London and London Assembly elections.

If the GLRO is unavailable to act, then the Deputy GLRO (DGLRO) may act in place of them."

- 6.4. Officers have indicated that the services and supplies in respect of which it is proposed that a contract is to be awarded have been procured in accordance with the Procurement Act 2023. In the event that the GLRO is minded to make the decision sought, officers must ensure that appropriate contract documentation is put in place and executed by the successful bidder(s) and the GLA before the commencement of the contract.

7. Planned delivery approach and next steps

- 7.1. This work will be delivered according to the following timetable:

Activity	Date
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Kick-off of contract	Summer 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 be published either 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 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:

Date:



10 July 2026

pp. Peter Sebastian, Assistant Director, Financial Services on behalf of Fay Hammond, Chief Finance Officer.