

## **ATTACHMENT B**

**NON-RESIDENTIAL REGISTER AND ROLLS  
METHODOLOGY AND PROGRAM PLAN**



# METHODOLOGY & PROGRAM PLAN

## Non-residential Register & Rolls

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v1.1	27/07/2015	Kirsten McLeod & Sally Aves	Version for Council Report (cost estimate breakdown moved to separate document)
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## Section 1: Introduction

### 1.1 Background

Recent changes to the *City of Sydney Act 1988* require the City to:

- Keep and maintain a register of non-residential roll electoral information, and
- Use the register to create a roll of non-resident owners of rateable land and roll of occupiers and ratepaying lessees.

These are ongoing obligations, and the CEO must maintain and regularly revise the register to ensure it is accurate. The obligations are not limited to the register being accurate at a particular point in time. The next Local Government elections will be held on 10 September 2016. The register and rolls must be in place to facilitate this election.

### 1.2 Approach

In order to determine a strategy to meet the new legislative obligation, the City used the following approach:

1. Develop and document a comprehensive understanding of the requirements of the legislation.
2. Identify a methodology that best meets the documented requirements.
3. Plan a program of activities to implement the identified methodology.

This approach sought to ensure all aspects of the complex requirements of the legislation were suitably captured and considered as part of methodology development. It also sought to ensure solutions were not pre-emptively determined.

The only constraint considered was that of the short timeframe to the next election and associated legislated milestones the City must achieve.

The City's comprehensive understanding of the legislative requirements (item 1, above) have been documented as Business Requirements. This document outlines the Methodology and Program Plan, as per items 2 and 3, above.

It should be noted that the City is in contact with the Office of Local Government (OLG) in relation to some of the issues with the legislation as currently drafted. This may result in some amendments to the legislation.

Should there be any amendments to the legislation, there may be changes required to the Business Requirements, Methodology and/or Program Plan.

Section 4 of this document outlines some of the potential impacts of potential legislative amendments. However, ultimately, the impact will be dependent of the nature and timing.

### 1.3 Fundamental Impossibility

The Business Requirements clearly show that the establishment and maintenance of the register and rolls is complex and challenging. There are a number of issues with the legislation that are either impractical, or arguably impossible, for the City to comply with. There are also other issues that produce consequences that could be considered inequitable.

In determining the Business Requirements, where there were issues with the legislation, or the legislation is silent on a requirement, assumptions were made so that a complete set of Requirements could be developed. The following overarching principles were used in the determination of the Requirements:

1. The intent of the legislation is to provide all natural persons and corporations owning or leasing, or actually occupying, rateable land in the City of Sydney Local Government Area (LGA) with a right to vote at Local Government elections.
2. Corporations with multiple interests in rateable land are not overrepresented on the electoral roll.
3. The non-residential enrolment process, and maintenance of the rolls, is fair and transparent.

While a complete set of Business Requirements has been determined, and a Methodology and Program devised (as outlined in this document) to best deliver the Requirements, it is fundamentally impossible for the City to fully comply with the legislation as it currently stands.

The legislation requires the City to achieve continual and absolute accuracy of the non-residential electoral register and rolls. It is not subject to the City making reasonable endeavours. Given there will always be persons that do not provide the required information, and there are day-by-day changes to entitlements to rateable land, it is impossible for the register to be completely accurate at any point.

The proposed Methodology and Program Plan is considered to be the City's best attempt to practically meet the legislative requirements within the timeframe. While it will not meet all the requirements (due to their inherent impossibility), it is considered the best approach the City can take if the issues identified with the legislation are not addressed.

## Section 2: Methodology

### 2.1 Summary of Requirements

As outlined in the Business Requirements, the establishment and maintenance of the non-residential register and rolls is comprised of the following processes:

1. Identify rateable land
2. Identify the persons that own, lease and occupy rateable land
3. Determine each person's entitlement
4. Receive nominations from those eligible and deem in some cases where nominations are not received
5. Manage changes to nominations
6. Manage revocations of nominations
7. Manage changes to information about a person
8. Manage changes to rateable land
9. Seek missing information for persons (and potentially penalise if not provided)
10. Objection to an entry on the roll
11. Verify and confirm the rolls for each election

Process diagrams for each of the above, as well as an overview process diagram showing the relationship between each of the processes, are included in the Business Requirements.

These processes reflect the business requirements for all aspects of the register and the rolls, based on the legislation. They do not show how the requirements will be met; that is instead articulated in this Methodology and Program Plan document.

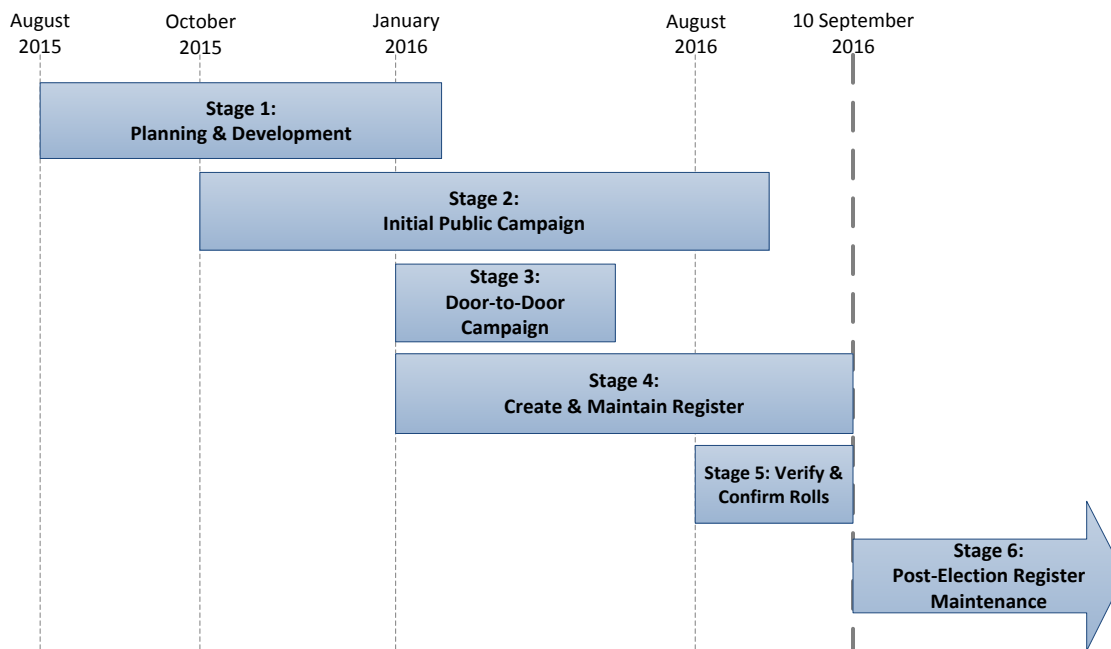
The Business Requirements illustrate that the establishment and maintenance of the register and rolls is complex – both from the City's perspective in implementing a solution, and for persons that may have an entitlement to be enrolled or make a nomination.

The key legislative dates that apply to the next election on 10 September 2016 are:

- Enrolment letters sent: 3 May 2016
- Nomination cut-off date: 4 July 2016
- Election (rolls) closing date: 1 August 2016

### 2.2 Methodology Overview

The proposed Methodology to deliver the non-residential register and rolls is divided into 6 stages. Given the very tight timeframe, some stages will need to run concurrently, at least in part.



This document outlines the methodology for all Stages. However, the details for Stage 6 (Post-Election Register Maintenance) are indicative at this stage and will be refined following a review post the 2016 election.

### 2.3 Key Methodology Components

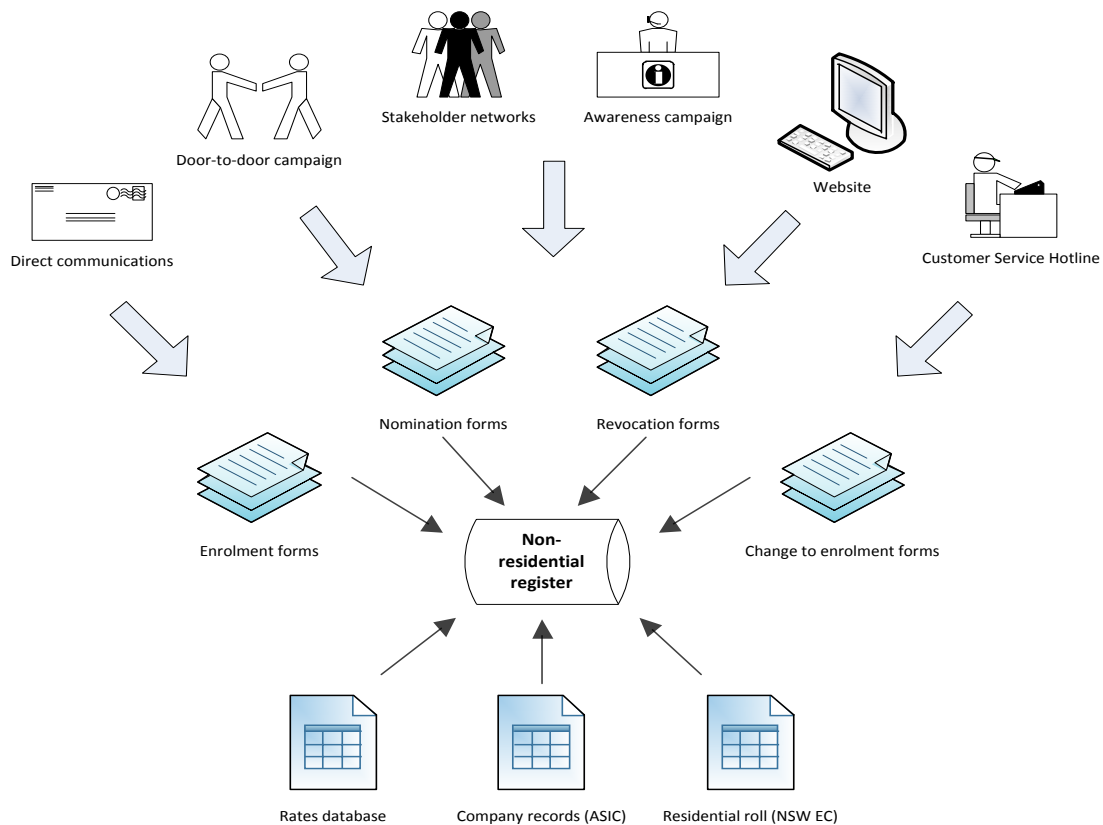
Detailed descriptions of each stage are outlined below. However, the core elements of the proposed Methodology can be summarised as follows:

- Directly contacting all owners of rateable land in writing, and any known/identified potential ratepaying lessees and occupiers (e.g. identified by owners, recent applicants to the City).
- Visiting all business-rated rateable land to directly contact occupiers.
- Directly communicating with existing stakeholder networks to raise awareness of the changes to non-residential voting and the City's associated activities.
- A broad and compelling awareness campaign about changes to non-residential voting in the City, focussing on both the benefit of enrolment as well as it being mandatory.
- A website, customer service hotline and publications to assist people identify their entitlement and understand the nomination process.
- Paper declaration forms for the provision of enrolment information and nominations (reply paid), requiring certified copies of evidence where such evidence cannot be obtained by the City another way.
- An IT system for storing the register and rolls.
- Data entry of information received via forms into the register and rolls IT system.
- Developing internal policies, procedures and delegations for managing the register and rolls.
- Regularly communicating in writing with enrolled persons to keep the information in the register and rolls current.



- Regular broad communication about mandatory non-residential enrolment and voting in the City of Sydney.
- Using information in the City’s Rates database, ASIC records, and the residential rolls managed by the NSW Electoral Commission to maintain the register and rolls.

Conceptually, the register and rolls will be predominantly populated using information provided via enrolment and nomination declaration forms, sourced from direct communication and a broad awareness campaign.



## 2.4 Stage 1: Planning & Development

Stage 1 is the detailed planning and development required to set up the non-residential register and roll program and prepare for delivery of the subsequent stages.

This Stage will occur in the main from August to October 2015. However, some activities will continue until January 2016.

During Stage 1 the following key activities will be completed:

- Recruitment of key positions for the Council Elections Unit.
- Establish program governance and oversight processes.
- External legal review of the Business Requirements for the non-residential register and rolls.
- Consultation with the OLG and NSW Electoral Commission.
- Workshop with the City of Melbourne to assist with refining detailed planning.
- Identification of rateable land from the City’s Rates system.
- Identification of owners and ratepaying lessees of rateable land in the City’s Rates system.
- Identification of potential ratepaying lessees or occupiers known to the City in its existing Applications system (e.g. applicants for food and licensed premises).

- Investigate obtaining the names and addresses of registered lessees, where available, from Land and Property Information.
- Determination of the entitlement (if any) of government-related organisations and agencies including, where there is an entitlement, the nature of any specific information that must be sought from such entities (e.g. company officers for government corporations).
- Identification of suitable stakeholder networks.
- Preparation of standard form correspondence.
- Preparation of standard forms (enrolment, nomination, revocation).
- Preparation of instructional documents on evidence requirements for ratepaying lessees and occupiers (certified copies of a lease, licence, or other document showing the parties, property address, term of occupation, amount payable, and if the amount includes a contribution for rates will be required).
- Customer experience focus group test and trial of enrolment and nomination process.
- Preparation of policies and procedures.
- Identification and establishment of required delegations from the CEO to staff.
- Preparation of customer service materials and FAQs.
- Preparation of customer information materials.
- Preparation of a detailed marketing and communications plan for the public campaign.
- Development of a website including an eligibility Q&A portal.
- Establishment of a customer service hotline.
- Internal communications and education campaign for staff that engage with businesses (e.g. Rangers, Health & Building, City Conversations, City Building and Safety).
- Determination of system, data and information requirements.
- Procurement of a service provider for the IT system (if in-house development is not considered the best solution once system requirements have been determined).
- Development and testing of the IT system.
- Procurement of a service provider or equivalent staff for the processing of forms, verification of evidence documents, and data entry of enrolment and nomination information.
- Procurement of a service provider for the door-to-door information campaign.
- Procurement of a bulk company record arrangement with ASIC or broker.
- Determination of the mechanisms/protocols for checking information with the NSW Electoral Commission.
- Determination of the mechanisms/protocols for updating the register based on changes to the City's Rates and Applications systems.

### 2.5 Stage 2: Initial Public Campaign

Stage 2 is the initial public campaign to educate and raise awareness of the new arrangements for non-residential voting in the City of Sydney, communicate eligibility for entitlement, and to source enrolments. To make the campaign compelling it will focus on both the benefits of enrolment as well as the fact it is mandatory.

This will be the first public release of information by the City and will seek to communicate the following key messages:

- Non-residential voting in the City is now mandatory.
- Eligible persons must provide the necessary enrolment information to the City.
- Enrolled persons must keep their enrolment information up-to-date with the City.

The aim is to target all persons (individuals and corporations) that may have an entitlement to be enrolled, as well as individuals known to such persons that may further reinforce or re-communicate the requirement about non-residential enrolment and voting.

This Stage will occur in the main from October to December 2015. However, the continued communication of key messages will continue up until the election closing date (1 August 2016).

During Stage 2 the following key activities will be completed:

- Broad marketing and communications strategy (reaching nationally and internationally) to raise maximum awareness of the new arrangements and need to provide information to the City for mandatory voting enrolment (i.e outdoor marketing, broadcast advertisements, social media, print and online, printed collateral, promotional arrangements with business sector organisations, applicable pop-up displays and events).
- Letters sent to each of the owners identified in Stage 1 advising of potential entitlement and the action that is required, and requesting details of their lessees and occupiers.
- Letters sent to each of the ratepaying and registered lessees identified in Stage 1 advising of potential entitlement and the action that is required, and requesting details of their occupiers.
- Letters sent to any lessees and occupiers identified by owners or other lessees as part of Stage 2 advising of potential entitlement and the action that is required.
- Information sent and/or presentations given to the stakeholder networks identified in Stage 1 to raise awareness and seek their support in getting eligible persons to provide information.
- Information provided by City staff that engage with business as part of ongoing dealings.
- Website live with an eligibility Q&A portal and forms available for download.
- Customer service hotline live (equivalent information to website and ability to ask and answer questions specific to a person's unique circumstances).

### 2.6 Stage 3: Door-to-Door Campaign

Stage 3 is to ensure the City directly contacts all occupiers in business-rated rateable land (the largest likely eligible group of non-residential occupiers) in an effort to generate enrolments. There is no existing list or dataset of occupiers in the City of Sydney. This Stage supplements Stage 2, which directly targets owners and raises general awareness of the new arrangements.

This Stage will occur from January to May 2016. Some media and marketing campaign activities from Stage 2 will continue during this period, as noted above.

During Stage 3 the following key activities will be completed:

- Visits to all business-rated rateable land to make direct contact with occupiers about the new arrangements for non-residential enrolment and voting.
- Printed information and the relevant form(s) provided to the occupiers as part of the visits.
- Records kept of all visits made, as evidence of the direct contact with occupiers.

### 2.7 Stage 4: Create & Maintain Register

Stage 4 is the physical population of the register IT system (following its development) and processing of enrolment and nomination forms. It also includes ongoing maintenance of the register to keep it current, such as managing changes to either rateable land or persons.

This Stage will start concurrent with Stage 3 (i.e. January 2016) and continue up until the election on 10 September 2016.

During Stage 4 the following key activities will be completed:

- Processing enrolment and nomination forms received by the City.
- Verification of evidence documentation received by the City.
- Checking prospective enrolees against the residential roll, via the NSW Electoral Commission.
- Checking corporation information and company officer nominees against ASIC company records.
- Letters sent in response to enrolments and nominations.
- Letters sent to seek missing information for enrolments and nominations.
- Data entry of persons into the register.
- Continual updating of the register where there are changes to rateable land.
- Continual updating of the register where there are changes to enrolled persons.
- Managing changes to nominees (e.g. revocation, resignation) and updating the register as appropriate.
- Letters sent to any new owners with relevant form(s) seeking enrolment and requesting details of their lessees and occupiers.
- Letters sent to any newly identified lessees and occupiers (e.g. provided by new owners) with relevant form(s) seeking enrolment.
- Enrolment letters sent to enrolled persons by 3 May 2016, as required by the legislation.
- Requests for nomination letters sent by 3 May 2016, as required by the legislation.
- Deeming nominees where required by the legislation, following the nomination cut-off on 4 July 2016 (including checking against ASIC company records where required).
- Enrolment letters sent to deemed nominees.
- Continuation of website communications and customer service hotline.
- Continuation of information being provided by City staff that engage with business as part of ongoing dealings.

Given the nature of information in the register, it would represent a useful tool for the City in better understanding businesses in the LGA. Accordingly, an 'opt in' consent to enable the City to use the information for other purposes will be included in enrolment and nomination forms.

### 2.8 Stage 5: Verify & Confirm Rolls

Stage 5 is the preparation of the actual rolls for the election, following the election closing date on 1 August 2016.

This Stage will run from 1 August 2016 up until the election on 10 September 2016.

During Stage 5 the following key activities will be completed:

- Extracting the roll of non-residential owners from the register on 1 August 2016.
- Extracting the roll of ratepaying lessees and occupiers from the register on 1 August 2016.
- Provision of the rolls to the NSW Electoral Commission for verification.
- Making changes to the rolls (and register) where advised of changes to persons or where persons cannot be verified by the NSW Electoral Commission.
- Sending letters to advise any enrolees of changes to their enrolment (including removal) following verification.
- Confirmation of the rolls once all changes have been made.
- Providing the confirmed rolls to the NSW Electoral Commission to administer for the 2016 election.

- Making the confirmed rolls available for public inspection during office hours at the office of the council.

### 2.9 Stage 6: Post-Election Register Maintenance

Stage 6 is the ongoing maintenance of the register and rolls following the election.

This Stage runs from 12 September 2016 on an ongoing basis.

The indicative activities are outlined below. However, a review will be undertaken following the 2016 election to identify lessons learned in relation to obtaining enrolments and nominations, and keeping such information up-to-date. This may identify changes to the proposed maintenance activities.

- Removing the confirmed rolls from public inspection (the rolls lapse following an election).
- Bi-annual letters sent to each enrolled person seeking confirmation or changes of details (a response will be mandatory).
- Information sent and/or presentations given to stakeholder networks annually to maintain awareness and seek their support in getting eligible persons to provide information.
- Maintenance of the website.
- Maintenance of the customer service hotline (on a smaller scale up until the beginning of the calendar year for each election).
- Bi-annual marketing and communications strategy to maintain awareness of non-residential voting in the City of Sydney, and seek persons provide or update their enrolment information (i.e. print and online, social media, printed collateral).
- Maintain the register (as per Stage 4).
- Verification and confirmation of the rolls for each election (as per Stage 5).

### 2.10 Methodology Rationale

While the City has a responsibility to enrol persons with a non-residential voting entitlement, this can only be achieved where persons provide the required information. There is no current dataset with all of the required information about persons that may have an entitlement.

The requirement to enrol persons and maintain the register is also ongoing and continual. A single campaign or survey to ascertain information at a point in time does not meet this requirement. Instead, the City needs to create a culture in which non-residential voting in the LGA is understood to be mandatory and persons actively provide and keep updated the required information.

Accordingly, the rationale for the proposed Methodology is as follows:

- The City's existing dataset of owners is an accurate record of the owners of rateable land in the LGA but does not contain all required information for any person entitled to be on the register and rolls (there is no date of birth or sex for natural persons).
- There is no existing dataset of persons that would meet the criteria under the legislation for ratepaying lessees and occupiers.
- A broad marketing and communications campaign would not, in and of itself, demonstrate the City made sufficient efforts to obtain enrolment information and nominations.
- Similarly, directly contacting persons with a potential entitlement would not likely yield all enrolment information and nominations and it is impossible to reach potentially eligible persons (or be certain that all have been reached).
- A combination of direct contact with as many persons with a potential entitlement and a broad marketing and communications campaign, focussed on educating persons about the arrangements and need to provide and update their information, is most suitable.

- The City can directly contact all persons in the groups with the largest number of persons with potential entitlements: owners of rateable land, and occupiers of business-rated rateable land.
- While owners are generally known by name and address, the only known information about occupiers is the location at which they may be (i.e. occupying rateable land) – hence a direct visit in lieu of a letter is the only way to demonstrate the majority of occupiers were contacted.
- Surveys to obtain data that have been undertaken by the City previously (e.g. the Floor Space and Employment Survey) were observational surveys. The information required for the register and rolls cannot be obtained observationally, and instead needs to be provided in a sufficiently robust manner so as to justify the inclusion of a person on an electoral roll.
- Resources equivalent in scale to a survey would be best used for a door-to-door awareness campaign of the largest group of occupiers (i.e. those at business-rated rateable land) to assist with education of the new arrangements and establishing an enrolment culture.
- Ratepaying lessees that are not occupiers, and non-residential occupiers in residential-rated rateable land, are likely to be small categories. Such persons will be contacted directly where identified (e.g. by owners) or captured as part of the broader awareness campaign.
- Other datasets likely comprise sub-sets of those that will be directly contacted by other means. Such datasets will not be used, to avoid duplication and risk of spamming, which would detract overall from the perception of a quality enrolment process being run by the City.
- For other electoral enrolment the obligation is on the enrollee to enrol. As such a campaign about mandatory non-residential enrolment will likely be interpreted in the same way and yield reasonable levels of non-residential enrolment information.
- The timeframe is too limited to develop a suitable, secure and robust online enrolment system. Instead, paper forms (reply paid) will be used. This will maximise the available period in which information can be provided to the City. Online enrolment may be considered for a future election where there is sufficient time to develop and implement a solution.
- Given the obligation on the City for the register to be accurate, and to be consistent with other application processes for businesses (e.g. parking permits), evidence to support some enrolments and nominations will be required. Certified evidence documents will be required where such information cannot be the subject of separate verification checks with other datasets (e.g. NSW Electoral Commission residential roll, ASIC company records). This will include copies of documents such as leases or other written records proving the entitlement to be enrolled, including the amount paid.
- The checking of enrolment and nomination information against other datasets where available, combined with the provision of certified evidence documents for those aspects that cannot be independently verified, will enable a signed declaration form (as opposed to a statutory declaration) will be sufficient for the suite of enrolment and nomination forms.
- The eligibility for entitlement and the nomination process is, for the circumstances of some persons, quite complex. Specific step-by-step assistance will be required to identify the correct entitlement and appropriate form. This is best provided via an online portal and customer service hotline.
- Policies, procedures and delegation(s) from the CEO to staff will be required to ensure the process is transparent and accountable and must be established at the outset.
- Existing City processes and resources will be used wherever possible, provided they are suitable and do not detract from business as usual activities or service levels.
- External service providers will be engaged for specific scopes of work such as IT system development, data entry, and aspects of the communications campaign, where the use of internal resources is not considered the best solution once detailed requirements have been determined.
- Timing constraints are significant and all activities will need to be undertaken concurrently to some degree.

**Non-residential Register & Rolls**

**2.11 Likely Scale of Register**

Due to the lack of available existing datasets, it is not possible at this point to reliably determine the number of persons that will be enrolled on the register. Other factors that compound this include:

- Entitlement is not limited to business-rated land (non-residential owners, ratepaying lessees and occupiers of residential-rated land that do not reside in the City of Sydney are eligible – e.g. property investors).
- While corporations in some circumstances may have two persons enrolled on their behalf, this is only possible if the corporations have two (or more) company officers and these officers are eligible (e.g. are not residents).
- The diversity and scale of business activity in the City of Sydney means there is a high likelihood of there being many non-resident natural persons and corporations with a single interest in one piece of rateable land (e.g. occupy one location), each having an entitlement.
- Given the value of land and cost of tenancies in the City of Sydney, it is highly unlikely that there will be many ratepaying lessees or occupiers in the City that do not pay at least \$4,000 for the lease and rates, or right to occupy in the case of the latter.
- Entitlement is not tied to a parcel of rateable land; it is for any piece of a parcel. A parcel of rateable land could have many pieces for the purposes of the register and thus many unique persons and corporations with individual interests (e.g. multiple occupiers with entitlements rather than such occupiers being considered joint and having to provide a nomination).

Currently there are approximately 114,000 parcels of rateable land in the LGA. Noting that utility lots are not considered rateable land for the purposes of the register and rolls, there are approximately 107,000 parcels of rateable land for which there may be owners, ratepaying lessees, and/or occupiers with entitlements. Approximately 86% is residential rated land.

The nature of an entitlement differs depending on the combination in which natural persons or corporations own, lease, or occupy land. Currently, the ownership combinations of rateable land are:

Ownership combination	Residential rated land	Business rated land
Owned by 1 natural person	52,632	2,772
Owned by 2 natural persons	28,488	2,364
Owned by 3+ natural persons	1,225	359
Owned by 1 corporation*	9,572	8,659
Owned by 2+ corporations*	202	391
Owned by a combination of natural persons and corporations	175	194

*\*Corporations in this case indicate entities other than natural persons. Not all these corporations will be eligible for an entitlement (e.g. incorporated associations are not eligible).*

Across all eligible rateable land, there are a total of 106,761 unique natural person owners and 9,896 unique corporation owners (there are also 302 owners that are late estates). Some of these natural persons and corporations have multiple interests in rateable land, in varying combinations.

Natural persons who reside in the LGA are not eligible for inclusion on the register. While it is not possible to determine from existing data the number of natural person owners that are residents, the most recent Census indicated that approximately half of all residential land in the LGA is rented.

The number of ratepaying lessees and occupiers is more difficult to determine. For a very small percentage of rateable land (0.5%), the City has details of the ratepayer that is not the owner. This is typically only for instances of Crown land that is being leased to a single entity for private purposes.

Other datasets that may give some indication of potential scale include:

- The 2012 Floor Space and Employment Survey identified 21,644 businesses occupying business rated land in the LGA. However, the survey was observational and based on use, rather than having any consideration of the structure of the entities occupying the space. As such it did not account for scenarios such as co-working arrangements or where a large company has a multi-entity structure.
- There are approximately 6,300 businesses in specific categories registered with the City. These include business such as backpackers, boarding houses, child care centres, food premises, hair & beauty, licenced premises, sex industry premises and skin penetration.
- The Australian Business Registered (ABR) indicated that, as of December 2014 there were 82,000 businesses with an active ABN and registered address in the City of Sydney.
- The Australian Bureau of Statistics (ABS) data from June 2013 indicates there were 63,127 actively trading businesses in suburbs in the City of Sydney (with some crossover into the Woollahra and Marrickville Local Government Areas).

However, both the ABR and ABS datasets are based on registered address which may or may not be the actual place of business (e.g. it may be the businesses accountant address based in the CBD). Conversely, there may be businesses occupying land in the LGA that have a registered address outside the LGA and are not included in the figures.



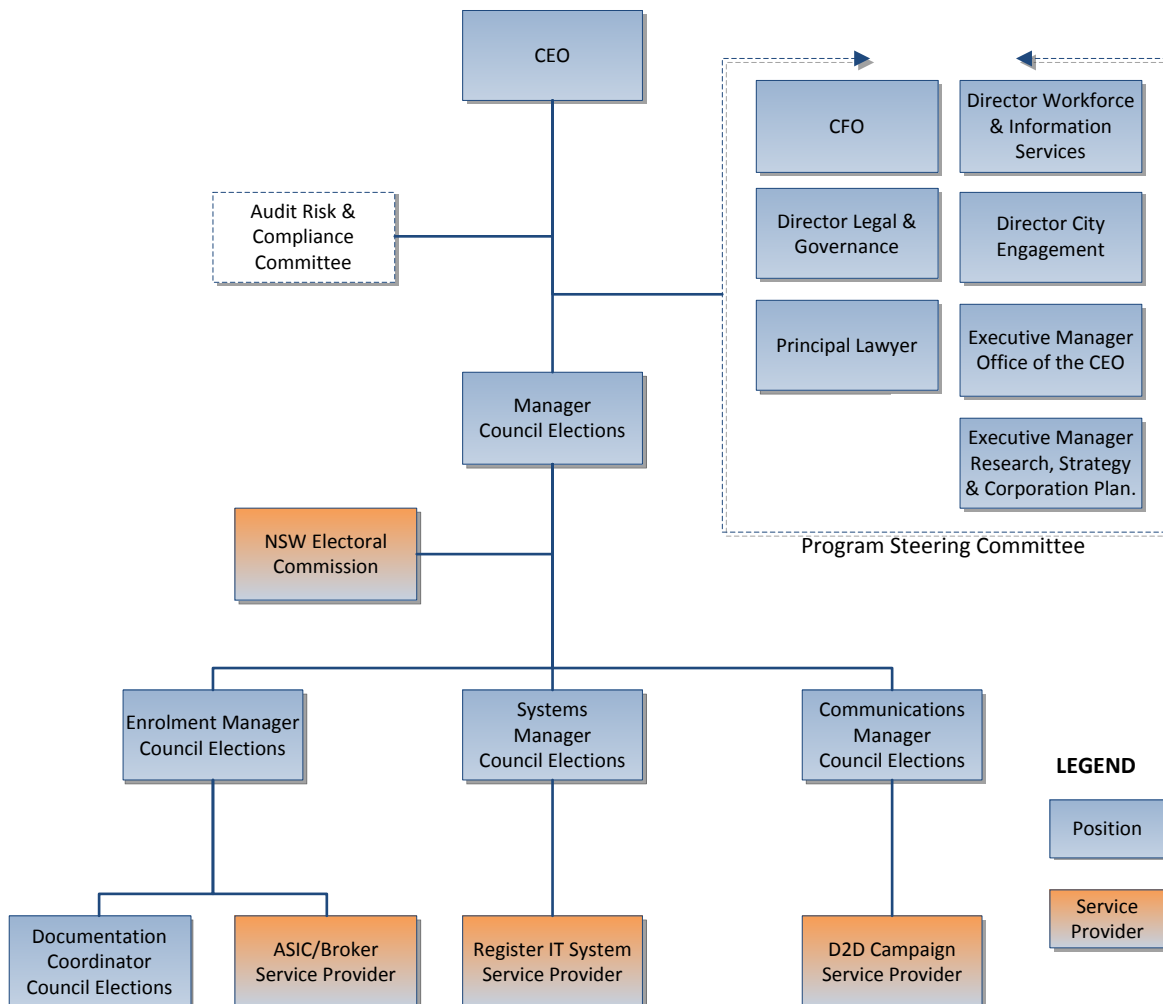
## Section 3: Program Plan

### 3.1 Program Structure & Scope

It is proposed that delivery of the program is managed by a dedicated unit reporting directly into the Office of the CEO. The Council Elections Unit (CEU) will draw on a mix of internal resources and external service providers to deliver the six-stage process described in Sections 2.2-9 above through the following four work strands:

1. **Program Management:** Program initiation, management and governance.
2. **Enrolment:** Identification of, and direct correspondence with, those likely to have an entitlement.
3. **Systems:** Systems development to hold and manage the register and create the rolls.
4. **Communications:** Broad multi-media campaign to inform and encourage enrolments and nominations.

The proposed organisational structure to achieve these activities is:



Note: the Register IT System and Door to Door Campaign resourcing is shown above as an external Service Provider. The appropriate internal or external solution will be determined during Stage 1.

The scope for each work strand lies with the following roles.

### Manager, Council Election Unit

- Program governance through:
  - Monthly reporting to and review by an internal steering group consisting of representatives from: OCEO, Legal & Governance, Finance, City Engagement, Workforce & Information Services and COO.
  - Quarterly reporting to the Audit Risk & Compliance Committee
  - Ongoing update to, and monthly review of, Risk Register in consultation with other stakeholders where appropriate.
  - Sourcing of probity advice for key program elements.
- Program initiation:
  - Recruitment of personnel.
  - Procurement of resources.
  - Establish office.
  - Establish policies and associated procedures and delegations.
- Program management:
  - Financial accountability.
  - Personnel management.
  - Contract management.
  - Records management.
  - Resource management.
  - Timeline/project management.
  - Key external stakeholder engagement (NSW Electoral Commission, Office of Local Government, City of Melbourne).

### Enrolment Manager

- Establish and manage processes to communicate directly with persons with possible entitlement:
  - Final determination of the full enrolment process.
  - Develop and manage production and distribution of standard correspondence and forms.
  - Develop incoming correspondence & forms management process.
  - Establish and follow due diligence protocols before adding or removing a person from the register.
- Content development:
  - Develop content and templates for standard correspondence, forms, FAQs, website, brochures and other customer information materials as required.
  - Source and manage sub-editing of content.
- Customer service capability development:
  - Develop materials and brief Customer Service personnel.
  - Develop and deliver internal communications and education campaigns for staff that engage with businesses (e.g. Health, Rangers).
- Map and engage stakeholder networks of persons with potential entitlements:
  - Map existing relevant City of Sydney networks.
  - Identify and fill gaps.
  - Engage persons with potential entitlement through these networks, for example by attending and speaking at events, adding information and links to our website on networks' communications.

### Systems Manager

- Initial scoping of system requirements to determine the preferred development process for the register system and data entry; this may involve a mix of internal resources and external procurement.
- Identify those with potential entitlement from existing City datasets and develop protocols/processes for extraction in a useable form.
- Manage internal/external systems providers of:
  - System to store and allow access to the Register and Roll.
  - Data entry process to populate the Register.
- Manage data extracts & inputs from external sources such as ASIC and NSW Electoral Commission.

### Communications Manager

- Work closely with City Engagement to deliver all aspects of the communications program.
- Develop overall marketing and communications strategy.
- Conduct a customer experience focus group test and trial of enrolment and nomination process.
- Develop and manage artwork for all external communications.
- Prepare and deliver personalised & multi-channel marketing and communications plan.
- Develop a website including eligibility Q&A portal.
- Scope, procure and manage door-to-door information campaign.
- Scope, procure and manage customer service hotline.

## 3.2 Resources & Costings

### Internal Resourcing

The Program Plan assumes that responsibility and costs for the following activities are absorbed by the relevant Division:

Division	Activity
Legal & Governance	Ongoing support and advice on governance, legal and risk issues
City Engagement	Planning and delivery of the marketing and communications strategy
	Website development
	Artwork and template development
	Customer Service (outside period with dedicated resource)
	Printing & mail out management
Workforce & Information Services	Support for HR processes, including recruitment, ICT requirements
	Extraction of data from Pathway
	Records management
City Life/COO	Sourcing external networks & supporting engagement
City Planning, Development & Transport	Supplying registered business details from Pathway (sub-set of occupiers)
City Projects & Property	Office accommodation for staff
CFO	Determination of rateable land
	Assistance identifying changes to rateable land and owners
	Procurement & Contract advice

### Cost Estimate

The total estimated cost to implement the program for the 2015/16 financial year is \$7,832,000. The cost for the 2016/17 financial year is estimated as being \$4,212,000.

The cost for the program in subsequent years cannot be determined at this time, due to the uncertainties around scale of the non-residential register and rolls, and the success of proposed maintenance activities.

A breakdown of the cost estimates, by activity and methodology stage, is outlined in the Non-residential Register & Rolls Program Cost Estimate document (Attachment C to the Report to Council regarding the Non-residential Register and Rolls Methodology and Program Plan).

### 3.3 Major Milestones

Stage	Milestone	Achieved by:	Responsibility
1	Manager positions filled, office established	18 Sep 2015	Manager Council Elections
1	Policies and associated procedures & delegations in place	18 Sep 2015	Manager Council Elections
1	Marketing and communications plan in place	30 Sep 2015	Communications Manager
1	Communication materials produced (standard correspondence, forms, website, FAQs)	30 Sep 2015	Communications Manager
2	Initial mailout to all identified in stage 1 as having potential entitlement	31 Oct 2015	Enrolment Manager
1	Procurement of IT system, data entry, customer service hotline and door to door services	31 Dec 2015	Manager Council Elections
2	Initial marketing and communications strategy delivered	31 Jan 2016	Communications Manager
4	Data entry commenced	31 Jan 2016	Systems Manager
3	Door-to-door campaign delivered	29 Apr 2016	Communications Manager
5	Enrolment letters & requests for nominations sent	3 May 2016	Enrolment Manager
5	Deeming completed	1 Aug 2016	Enrolment Manager
5	Roll extracted and sent to NSW EC	26 Aug 2016	Systems Manager
5	Roll verified, updated and available for inspection	10 Sep 2016	Systems Manager
6	Mailout to those enrolled seeking updates	10 Dec 2016	Enrolment Manager
6	Bi-annual marketing and communications campaign delivered	31 Mar 2017	Communications Manager

3.4 Key Stakeholders

Key internal stakeholder relationships:



Key external stakeholder relationships:

Stakeholder	Impact of program
CofS ratepayers	Expectation that CofS will discharge its obligations in a professional way
OLG	As those with primary oversight of Local Government and our link into State Government
NSW Electoral Commission	<ul style="list-style-type: none"> <li>Requirement for ongoing verification of those on the Register &amp; final verification of the proposed Rolls</li> <li>Processing failure to vote/excuses</li> </ul>
ASIC/broker	Information source
Existing internal stakeholder networks	Offer access to those with potential entitlement

3.5 High Level Risks

Below are the current high level risks associated with the register and rolls. Additional lower level risks are recorded in the Project Risk Register.

Risk Description	Rating	Treatment Strategy
Overall process challenged or questioned due to inability of complying with the legislation.	Very High	<ul style="list-style-type: none"> <li>Raising issues with OLG &amp; Minister</li> <li>Ongoing briefings to Council</li> <li>Ongoing external advice</li> </ul>

**Non-residential Register & Rolls**

Risk Description	Rating	Treatment Strategy
Inability to effectively compel provision of information as there are no penalty notice provisions in the legislation.	Very High	<ul style="list-style-type: none"> <li>Raising issues with OLG &amp; Minister</li> </ul>
Register/rolls inaccurate and/or incomplete at any one time; ongoing accuracy is a requirement of the legislation.	Very High	<ul style="list-style-type: none"> <li>Methodology adopts best endeavours rationale.</li> </ul>
Inability to identify all rate paying lessees and/or occupiers as there is no existing dataset making us reliant on provision by individuals.	Very High	<ul style="list-style-type: none"> <li>Methodology requires declaration by individuals reporting to us.</li> <li>Marketing and communications to emphasise compulsion of complying with information requests.</li> </ul>
Boundary changes are made to the LGA as a result of the Fit for the Future process prior to the 2016 Local Government election, potentially changing those entitled to be on the non-residential register and rolls.	Very High	<ul style="list-style-type: none"> <li>Ensure Register IT System is scalable.</li> <li>Nature of other risk treatment strategies to be determined once nature of any boundary changes known.</li> </ul>

## Section 4: Potential Legislative Changes

### 4.1 Impact on Methodology & Program Plan

As noted in section 1.2, above, there is some possibility that amendments to the legislation may be made. These would principally be in response to issues identified by the City and raised with the OLG. The issues render the legislation impossible for the City to comply, or produce consequences that could be considered inequitable.

The likelihood and timeframe for any amendments is yet to be determined. Given the tight timeframes until the next election, it is not possible to wait for issues with the legislation to be resolved. Instead, work must continue on the basis of the legislation as is, with a view to changing the Business Requirements, Methodology and/or Program Plan once any changes occur.

The exact impact of any changes cannot be known until the nature and timeframe of the changes has been determined. As an indication, the below table lists the elements that the City is aware are being considered for potential change by OLG and the likely impact of a change to that element.

In some cases, the change could affect entitlement and nomination processes. Depending on when it took effect, this may result in a need to communicate changes to the process and revise/reprint materials such as forms, brochures, and website copy.

Potential Change	Nature of Impact
Accuracy of register and rolls is not absolute.	This would enable the City to meet its obligations under the legislation as it is considered that the Methodology and Program Plan, when implemented, would be considered reasonable endeavours to establish and maintain the register and rolls.
Exemption for the City from the <i>Privacy and Personal Information Act</i> 1998 in relation to the non-residential register and rolls.	This would make it easier for owners to provide the City with information about their lessees and occupiers, as they would not need to seek a privacy waiver from each lessee and occupier to do so. Ultimately it should result in greater accuracy for the register and rolls.
Provision to enable the City to issue a penalty notice to a person that fails to provide the required or correct information for the register.	Planning has assumed this provision will become available. If there is no change, the City would still advise it is illegal to not provide information; there would just not be any penalty notices issued.
Removal of sole reference to “parcels” of land in one provision (all other references in the legislation are to “rateable land”).	Planning has assumed that all entitlements are in relation to “rateable land”, with no consideration needed to “parcels”. If this were not the case, there would be change to the eligibility and nomination processes. Depending on when this change occurred, this may require a re-education campaign, and re-printing of forms and brochures.
Removal of the requirement to enrol all natural persons that own, lease or occupy rateable land in conjunction with a corporation where that group fails to submit a nomination.	Change to the nomination process as it currently stands. Any such change would require changes to all materials that refer to nomination and associated nomination forms. Depending on when this change occurred, this may require a re-education campaign, and re-printing of forms and brochures.
Mechanism to address that some corporations may not be able to make a nomination if they jointly own, lease or occupy rateable land with another corporation that has already participated in another nomination.	Change to the nomination process as it currently stands. Any such change would require changes to all materials that refer to nomination and associated nomination forms. Depending on when this change occurred, this may require a re-education campaign, and re-printing of forms and brochures.
Inclusion of an order of precedence for considering sole corporation owners, lessees and occupiers when deeming nominees for such corporations after the nomination cut-off date.	Change to the nomination process as it currently stands. Any such change would require changes to all materials that refer to nomination and associated nomination forms. Depending on when this change occurred, this may require a re-education campaign, and re-printing of forms and brochures.

Potential Change	Nature of Impact
Timing for the provision of the “authorised copy of the roll” (in the Local Government Act) as opposed to the “confirmed” rolls (in the City of Sydney Act).	Planning has assumed the provisions in the recently amended City of Sydney Act take precedence. If this were not the case, there would be change to the verification and confirmation process, and possibly changes to public materials (e.g. website copy).