

Form F34C – Application for approval as an eligible protected action ballot agent

[Fair Work Act 2009](#), section 468A

This is an application to the Fair Work Commission for approval of a person as an eligible protected action ballot agent in accordance with Part 3-3 of the [Fair Work Act 2009](#).

Part 1 – The Applicant



These are the details of the person who is applying to be approved as an eligible protected action ballot agent.

Legal name of proposed protected action ballot agent (if an individual give full first name, middle name(s) and surname)	Lumi Technologies Pty Ltd
ACN (if a company)	102 707 933
Trading name or registered business name (if applicable)	
ABN (if applicable)	41 102 707 933
Contact person (if applicable)	<div></div>
Postal address	<div></div>
Suburb	
State or territory	
Phone number	
Email address	

Does the Applicant need an interpreter?



If you have trouble accessing this information, please contact us. We can arrange to provide it in another format. You can find information about [help in your language](#) on our website.

☐ Yes – Specify language

☒ No

Does the Applicant require any special assistance at the hearing or conference (for example a hearing loop)?

☐ Yes – Please specify the assistance required

☒ No

Does the Applicant have a representative?

A representative is a person or organisation who is representing the Applicant. There is no requirement to have a representative.

☐ Yes – Provide representative's details below

☒ No

The Applicant's representative



This is the person or organisation that is representing the Applicant (if any).

Name of person			
Firm, organisation, company			
Postal address			
Suburb			
State or territory		Postcode	
Phone number			
Email address			

Is the representative a lawyer or paid agent?

<input type="checkbox"/> Yes — please select:	<input type="checkbox"/> Lawyer <input type="checkbox"/> Paid agent
<input type="checkbox"/> No	

Declaration by an officer of the person (corporation or industrial association) applying for approval as an eligible protected action ballot agent

This declaration should be completed if the proposed eligible protected action ballot agent is a corporation or an industrial association. Complete each part of the declaration below.

Giving false or misleading information is a serious offence.

A person who:

- knowingly or recklessly makes a false or misleading statement in an application for approval as an eligible protected action ballot agent; or
- knowingly gives false or misleading information in an application for approval as an eligible protected action ballot agent

is guilty of an offence, the punishment for which is imprisonment for up to 12 months if the statement is made or information is provided knowingly, or up to 6 months if the statement is made recklessly – see Part 7.4, section 136.1 and section 137.1 of the *Criminal Code*.

This is a declaration by an officer or employee of the person proposed in an application to the Fair Work Commission under section 468A of the *Fair Work Act 2009* for approval as an eligible protected action ballot agent.



This must be your **full legal name**.

I,

Legal first name (eg Robert not Rob)	Oliver
Middle name(s)	
Surname	Bampffield
Office or position held	APAC Sales Director

I declare that each answer I give at paragraphs (a) to (f) below and the reasons I give for the answer are true and correct:

- (a)** Who will carry out the functions of the proposed eligible protected action ballot agent if the application is approved?

Identify the individuals by name and role, or describe the groups of individuals who will carry out the functions for the Applicant:

The functions of the ballot will be completed by staff members of Lumi Technologies Pty Ltd (Lumi). Staff members of the company that would be involved in running the ballot will all have been trained in Lumi Electa software and systems and have had a minimum of 6 months' experience with the company.

At the time of application there are 6 members of staff suitably qualified and trained on the Lumi Electa software. They are in turn supported by the platform development team based in Lumi groups UK and Denmark offices.

- (b)** Are each of the individuals or groups identified in paragraph (a) a fit and proper person to be an eligible protected action ballot agent for the purposes of section 468A of the Fair Work Act?

☒ Yes

☐ No

The reasons for my answer are:

All staff members undergo criminal record checks prior to beginning their employment at Lumi. Lumi is a provider of voting platforms in Australia for over 15 years.

All employees that would be involved in running a protected action ballot will have undergone extensive training on the required software.

Lumi staff also undergo data security training and anti-corruption training on a regular basis. Logs of training undertaken by staff are readily available.

- (c)** What steps will the proposed eligible protected action ballot agent take to ensure that only fit and proper persons will be involved in conducting protected action ballots?

As per the above question only Lumi staff that have undergone both record checks and full training will be involved in conducting ballots.

- (d)** Can the proposed eligible protected action ballot agent ensure the secrecy and security of votes cast in any protected action ballot?

☒ Yes

☐ No

The reasons for my answer are:

The platform implements a set of cryptographic protocols which ensure reliable and secure elections. Votes are encrypted on the voter device before being transmitted which ensures that absolutely nobody can read their contents, not even the system administrators.

Decryption keys are distributed among several trustees, and only when a pre-configured minimum threshold of trustees is reached can votes be decrypted and counted.

Furthermore, digital signatures are used to ensure that every ballot comes from an eligible voter, and that it has not been tampered with, thus avoiding ballot stuffing and ensuring the integrity of the vote.

Electa can authenticate voters via credentials that are sent securely through e-mail or SMS. Electa can also integrate with existing client systems (intranets, etc.) that support SAML or OIDC protocols, to delegate the authentication and provide voters with Single Sign-On experience, where they would be able to log in using their current credentials.

Lumi follows the principles defined by the ISO/IEC 27001 standard, as reflected in our ISMS - Information Security Management System, covering all the requirements and controls defined for all security dimensions. An annual review validates that Lumi has implemented such controls, including guidelines and general principles for initiating, implementing, maintaining, and improving information security management within an organization.

As part of our commitment to excellence, our technicians conduct an annual review to ensure ongoing compliance with the requirements and controls set forth by the ISAE 3000 SOC2 standard. Amid an ever-evolving threat landscape and increasingly severe penalties, there is a tendency to seek stricter levels of assurance. ISO 27001 focuses on the design and implementation of static information security controls, while ISAE 3000/SOC 2 also allows the operational effectiveness of these security controls to be tested over a period of time, providing a more complete and practical perspective.

Lumi has received the Cyber Essentials Plus certificate, an international security standard by the UK's National Cyber Security Centre, ensuring the security of software and IT processes and that organizations are protected from data breaches, mitigating the risk of cyber threats.

All our hosting solutions also comply with ISO/IEC 27001:2013, ISO/IEC 27017:2015 and ISO/IEC 27018:2019 standards.

These certifications reflect our commitment to excellence and confidence in the delivery of secure and reliable services in the field of digital voting.

- (e) Can the proposed eligible protected action ballot agent ensure that any protected action ballot will be fair and democratic?

☒ Yes

☐ No

The reasons for my answer are:

The platform implements mechanisms that allow voters to verify that their vote was cast as intended and recorded as cast. These voter verifiability features maintain voter privacy and prevent vote selling and coercion.

Electa also uses mathematically verifiable mechanisms to decrypt and tally the votes, to ensure that the result of the decrypted ballots really comes from the content of the encrypted ballots.

These mathematical proofs can be made available so any auditor can verify that the results have been counted as recorded, without revealing the content of individual ballots, and always protecting voters' privacy.

Our voting protocol is publicly available, and open-source code has been used to build the voting platform. All actions in the system are logged in a hash chain, using cryptographic checkpoints to ensure nobody can tamper with the logs.

- (f) Can the proposed eligible protected action ballot agent conduct any protected action ballot expeditiously?

☒ Yes

☐ No

The reasons for my answer are:

Electa is an online voting platform that enables voters to securely and easily cast their vote from anywhere and on any modern internet-enabled device.

Votes are cast instantly. At the end of the voting period ballots are decrypted, and results are produced within minutes.

Audit reports are also available within a similar period of time.

The initial configuration of the ballot and distribution of login credentials to voters would be conducted by Lumi staff who, if required, can complete this process within a week. However, typically the process takes less than 48 hours.

Sign the declaration

Signature		Date	06/06/2025
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PLEASE RETAIN A COPY OF THIS FORM FOR YOUR OWN RECORDS

Consent to contact by researchers

The Fair Work Commission undertakes research with participants in bargaining matters to ensure a high-quality process. Some research may be undertaken by external providers on behalf of the Fair Work Commission.

Do you consent to the contact details provided on page 1 of this form being provided to an external provider of research services for the sole purpose of inviting you to participate in this research?

☒ Yes

☐ No