

Scrutiny of the Electoral Commission's financial estimate for 2025-26

November 2024



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November 2024



About the Committee

The Committee was established on 16 July 2021. Its remit can be found at:
www.senedd.wales/SeneddLIC

Current Committee membership:



**Committee Chair:
David Rees MS**
Welsh Labour



Janet Finch-Saunders MS
Welsh Conservatives



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Conclusion and Recommendations

Conclusion 1. Subject to the conclusions and recommendations to this report, the Committee is content that the financial Estimate for 2024-25 is consistent with the economical, efficient and effective discharge by the Commission of its functions in relation to devolved Welsh elections and devolved Welsh referendums..... Page 24

Recommendation 1. The Committee recommends that future Estimates make clear the allocation of funding to core business costs and to direct event costs. Page 24

Recommendation 2. The Committee recommends that the Commission provides a breakdown of costs of the various activities related to the Senedd 2026 election, and provides the Committee with an update of any underspend predicted in these areas..... Page 24

Recommendation 3. The Committee recommends that the Commission provides further information on how the Estimate for 2025-26 is likely to compare with future financial years which include Senedd and local elections..... Page 24

Recommendation 4. The Committee recommends that the Commission communicates regularly with the Committee throughout the year, and appears again before the Committee in a formal capacity and outside of its annual scrutiny session, to provide updates on its planned work in the run-up to the 2026 election..... Page 24

Recommendation 5. The Committee recommends that the Commission puts forward its views to the Senedd's Finance Committee on the challenges posed by the timing of the UK and Welsh Government Budgets, and the impact this has to provide their Estimates by the statutory deadline, so that they can be incorporated into its review of the Budget Process Protocol. Page 25

Recommendation 6. The Committee recommends that the Commission commits to:

- ringfencing additional funding for direct event costs to activities associated with the 2026 Senedd election;

- drawing down only what is necessary from the Welsh Consolidated Fund;
- returning any underspend to the Welsh Consolidated Fund; and
- providing assurances that, should there be an underspend in one area of work, the remaining funds will not be re-allocated to other areas.
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Recommendation 7. The Committee recommends that a further break-down of costs are provided, to demonstrate the consequential costs, if any, associated with Senedd Reform which are in addition to an 'ordinary' election year. Page 25

Recommendation 8. The Committee recommends that the Commission provides updates to the Committee on:

- how its engagement work with under-registered groups is progressing; and
- how it intends to measure the impact the paid-for advertising campaign is having on both under-registered groups and the wider electorate.
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1. Introduction

Background to the scrutiny of the Electoral Commission's financial Estimates

1. The Electoral Commission's (the Commission) work on devolved Welsh elections and devolved Welsh referendums is paid for from the Welsh Consolidated Fund. The Senedd's Llywydd's Committee¹ (the Committee) is responsible for scrutinising the amount of money requested for this purpose as set out in financial Estimates submitted to the Committee each year by the Commission. The Committee is also responsible for scrutinising the Commission's five-year plans relating to its work on devolved Welsh elections and devolved Welsh referendums.

2. The Senedd's Standing Orders 20.20A and 20.20B set out that:

"The Electoral Commission must submit an Estimate of its income and expenditure that is attributable to the exercise of its functions in relation to devolved Welsh elections and referendums, as required under paragraph 16A of Schedule 1 to the Political Parties, Elections and Referendums Act 2000, to the Llywydd's committee under SO 18B.2 as soon as reasonably practicable but no later than 1 October." (20.20A)

"The Llywydd's Committee must, having:

(i) consulted and taken into account any advice given to it by the Welsh Ministers, and;

(ii) had regard to any reports made to it by the Comptroller and Auditor General and to any recommendations contained in the reports;

*consider and lay before the Senedd, no later than 22 November, a report including the Estimate, with any modifications which the Committee, having consulted and taken into account any representations made by the Electoral Commission, considers appropriate."*² (20.20B)

¹ [The Senedd's Llywydd's Committee](#)

² [Senedd, Standing Orders of the Welsh Parliament, Standing Orders 20.20A and 20.20B.](#)

3. At certain times (i.e. following a Senedd election or at the request of the Llywydd's Committee) the Commission must also submit to the Committee a five-year plan³ setting out the Commission's aims and objectives relating to devolved Welsh elections and referendums in the ensuing five-year period. The Committee considered and approved the plan in its November 2021 report.⁴

4. The Committee must scrutinise any Estimates and plans submitted to it by the Commission to ensure consistency with the economical, efficient and effective discharge by the Commission of their functions in relation to devolved Welsh elections and devolved Welsh referendums.

5. The Estimate laid by the Committee in accordance with Standing Order 20.20B will then appear in the Annual Budget Motion, for agreement by the Senedd.⁵

Submission of the Electoral Commission's financial Estimate for 2025-26

6. The Commission submitted its financial Estimate for 2025-26⁶ to the Committee on 30 September 2024, along with a covering letter.⁷

7. The Committee met on 4 November 2024 to scrutinise the Estimate and plan. The meeting was attended by the following representatives of the Commission:

- Professor Dame Elan Closs Stephens CBE (Electoral Commissioner for Wales)
- Vijay Rangarajan (Chief Executive and Accounting Officer)
- Rhydian Thomas (Head of the Electoral Commission in Wales)
- Niki Nixon (Director of Communications, Electoral Commission)

8. The Committee must consult the Welsh Ministers on any Estimates and plans submitted to it by the Commission and have regard to any advice provided by the Welsh Ministers before deciding if it is satisfied with the Estimates and plans. The Committee shared the Commission's Estimate for 2025-26 with the

³ [The Electoral Commission, Corporate Plan for Wales 2022/23 to 2026/27](#)

⁴ [Scrutiny of the Electoral Commission's financial Estimate for 2022-23 and five-year plan for 2022-23 to 2026-27, and annual report for 2020-21](#)

⁵ See [Standing Order](#) 20 for an explanation of the Senedd's budget process.

⁶ [Financial Estimate of the Electoral Commission 2025-26](#)

⁷ [Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission](#)

Welsh Government on 1 October 2024. The advice of the Cabinet Secretary for Housing and Local Government was received on 17 October 2024.⁸

Agreement of the Finance Committee's Statement of Principles

9. The Senedd's Finance Committee published a set of principles, known as the Statement of Principles⁹, that it expects bodies funded directly from the Welsh Consolidated Fund to have regard to when making budget proposals e.g. that Budget requests should be set in the context of the long term financial funding situation in Wales and funding pressures in the wider public sector. The Commission is one such body and was asked to adhere to these principles when preparing its financial Estimate for 2025-26. The Committee has also agreed to adopt the Finance Committee's statement of principles, to underpin its scrutiny of the Commission's financial Estimates.

⁸ [Letter from the Cabinet Secretary for Housing and Local Government, 17 October 2024.](#)

⁹ [Statement of Principles between the Senedd's Finance Committee and Directly Funded Bodies](#)

2. The Electoral Commission Annual Report and Accounts 2023-24

10. The Commission laid its Annual Report and Accounts for 2023-24 before the Senedd on 29 July 2024.¹⁰ This included a Wales (devolved) annual report for 2023-24¹¹, setting out the Commission's work on devolved matters in Wales. It also provided a breakdown of expenditure relating to Welsh activities.

11. The report noted that during 2023-24, the Commission utilised 96 per cent of its of resources from the £1.5 million available. This represents an underspend of £19,000. The report states that "this was predominately staffing £0.9m (60%); the remaining amounts represent the Senedd contribution to common activities and corporate overheads".¹²

12. The Commission noted much of its work focused on supporting the programme of electoral reforms being delivered by Welsh Government during 2023-24. This included:

- Working closely with Welsh Government officials on policy development;
- Providing comprehensive written evidence on the Senedd Cymru (Members and Elections Bill), the Elections and Elected Bodies (Wales) Bill and the Senedd Cymru (Electoral Candidate Lists) Bill; and
- Appearing before Senedd Committees to give evidence on the three bills.

13. The Commission also focused on its advice and support service to stakeholders, including electoral administrators and candidates, agents and parties; and developed resources for schools as part of its programme of democratic engagement in Wales.

¹⁰ [The Electoral Commission Annual Report and Accounts 2023-24](#)

¹¹ [The Electoral Commission Annual Report and Accounts 2023-24. Wales Annual Report](#)

¹² [The Electoral Commission Annual Report and Accounts 2023-24. Wales Annual Report](#)

14. In terms of corporate activities, the Commission moved into its new office in March 2024. It said:

“The new premises offers the space to work as a team, the potential for future growth in staff numbers, and supports us to host meetings of various stakeholder groups.”¹³

15. In January 2024, the Commission provided additional information relating to its office move at the request of the Committee. Total costs for its previous offices at Companies House was approximately £24,000 for the last year of the lease. The letter also provided proposed costs for the new office but did not include a total cost.

16. When asked to clarify how the new offices were being utilised and whether they provide value for money, the Chief Executive stated:

“what we’re doing in each of these cases is trying to strengthen the offices outside London; it’s another way of both getting brilliant people to work for us, but also to save some of our costs and to increase our reach and understanding across the UK. So, we’re being very location neutral in what we’re doing and in our recruitment processes, which is one of the parts of our estate strategy.”¹⁴

The Electoral Commission's Corporate Plan for Wales

17. In October 2021, the Commission submitted its Corporate Plan for Wales 2022/23 – 2026/27 (the ‘Plan’)¹⁵ to the Committee. The Plan outlines the Commission's five strategic objectives:

- Accessible registration and voting;
- Transparent political campaigning and compliant political finance;
- Resilient local electoral services;
- Fair and effective electoral law; and
- A modern and sustainable electoral system.

¹³ [The Electoral Commission Annual Report and Accounts 2023-24, Wales Annual Report](#)

¹⁴ RoP, 4 November 2024, paragraph 186

¹⁵ [The Electoral Commission's Corporate Plan for Wales](#)

18. The Plan also sets out the corporate performance indicators for 2023-24, which will be used to measure performance against its strategic objectives. It notes the Commission will measure how well it realises these improvements over the period of the Corporate Plan, using a range of indicators for Wales and across the UK.

19. The Commission submitted its assessment of its performance in 2023-24 alongside its Estimate for 2025-26. It said:

“We are making good progress against the performance indicators [PIs] for the Welsh Corporate Plan. The end of year figures for all PIs show we met all except two targets set at the beginning of the year (an improvement on the four targets missed in 2022/23).”¹⁶

20. The Commission added:

“We gave timely notifications of the outcome of party and non-party campaigner registration applications in 80% of cases, against a target of 90%. This was due to unexpectedly higher numbers of applications submitted and insufficient staff to handle these cases. Mitigations have since been put in place for future unexpected surges in applications received.”¹⁷

21. The Commission was also unable to meet its target dates for implementing all of the internal audit recommendations agreed by the Audit and Risk Assurance Committee due to staff capacity and availability. However, these recommendations were completed by their revised due date.

22. The Committee inquired about the development of key performance indicators, and the Chief Executive responded:

“we'd like to have some basic service indicators. So, we ought to be getting back responses to everything, from letters, to freedom of information requests, to responses on consultation in good time and with high quality—that's the kind of service standards part. But then, in our reporting, following each election, we look at things like trust in elections, we look at the

¹⁶ [Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission](#)

¹⁷ [Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission](#)

*voter experience, we look at how, for example, disabled voters are able to participate, we look at the under-represented groups. And so, some of these system indicators are really important, that we can continue to monitor, and then, with a wide variety of Governments and partners, work on to try to improve them.*¹⁸

23. The Committee also sought clarification of whether these indicators would be incorporated into the annual report in future, to which the Chief Executive confirmed that “yes”¹⁹, they would.

¹⁸ RoP, 4 November 2024, paragraph 170

¹⁹ RoP, 4 November 2024, paragraph 172

3. Scrutiny of the Electoral Commission's financial Estimate for 2025-26

Overview

24. The total of the Estimate submitted by the Commission for the financial year 2025-26 was £2.742 million. This is an increase of £1.178 million in cash terms and equates to a 75 per cent increase compared with the Estimate for 2024-25. The Estimate is at Annex A. The Commission explains the funding increase in its covering letter to the Estimate, saying:

"You will see from the attached Estimates that we have presented you with savings for most teams' core activities, except where we expect increased activity relating to the forthcoming Senedd elections. We are continuing our work in strengthening the Commission through investments in our finance, procurement HR and other support teams..."²⁰

25. In response to the Committee's consultation with the Welsh Government on the Commission's Estimate, the Cabinet Secretary for Housing and Local Government noted the significant increase in funding and advised that, "Given the current budget pressures on the Welsh Consolidated Fund, the Committee may wish to seek further clarification on these costs..."²¹

26. The Commission's covering letter to the Estimate, notes £1.315 million has been allocated for core business (compared with £1.441 million for 2024-25, an 8.7 per cent decrease in cash terms) and £1.216 million for direct event costs (compared to £124,000 for 2024-25, an 883.5 per cent increase in cash terms). £211,000 is also sought for the Corporate Plan in 2025-26. No funding was sought for this in 2024-25.

27. The Committee noted that the Commission's 2025-26 Estimate does not show how the constituent elements correlate to 'Core' and 'Event' categories, making it difficult to understand how they are allocated. The Cabinet Secretary for

²⁰ [Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission](#)

²¹ [Advice from the Cabinet Secretary for Housing and Local Government on the Electoral Commission's financial Estimates](#)

Housing and Local Government also highlighted this in her response to the Committee's consultation on the Estimate, saying:

*"The Committee may also wish to satisfy itself with the small discrepancies between the letter and the Estimate table, for example the letter separates core and event costs, but the table does not."*²²

28. When questioned by the Committee on break-down of the costs, the Chief Executive explained the Commission's approach to estimating core costs, stating:

*"... having watched and listened to your previous commentaries and recommendations, and we can run through how we've taken those forward, we've tried to use exactly the formula set out in the funding memorandum approved and noted by the three Parliaments. So, we've taken all the core costs for the whole commission and simply allocated that 4.6 per cent for Wales based on population."*²³

29. The Committee also noted that the Commission had published its 2023-24 accounts which quantified its total expenditure relating to staff costs and goods and services, as well as the unused funds for devolved activities in Wales. On this issue, the Committee inquired whether the Commission would consider publishing a detailed breakdown of its outturns against Estimates for Wales in its accounts in future.

30. On both these points, the Commissioner and Chief Executive wrote to the Committee providing more details on the allocation of funding for core and event activities, and committed to "provide the Committee with the breakdown of outturns versus Estimate as suggested moving forwards".²⁴

Communication

31. When submitting its 2024-25 Estimate, the Commission also submitted its 2023-24 supplementary budget without having notified the Committee in advance of its requirement for additional funding. The Committee noted in its report:

²² [Advice from the Cabinet Secretary for Housing and Local Government on the Electoral Commission's financial Estimates](#)

²³ RoP, 4 November 2024, paragraph 64

²⁴ [Letter from the Electoral Commissioner for Wales following scrutiny of the Electoral Commission's financial Estimate for 2025-26](#)

“The Committee urges the Commission to keep lines of communication open over the next year. We are concerned that the Commission has made decisions such as procuring a new office and making up for chronic underfunding without telling the Committee in advance. Presenting these costs once they have already been agreed or even paid does not sit well with the Committee.”²⁵

32. The Cabinet Secretary for Housing and Local Government noted the significant increase in budget for 2025-26 compared to 2024-25, questioning why it had not been communicated before the Estimate was presented. She suggested that the Committee explore “the reasons why they were not outlined in the Corporate Plan for 2022-23 to 2026-27”.²⁶

33. In reference to this point, and the wider issue of communicating spending decisions, the Committee sought clarification on whether measures had been put in place to improve matters. Recommendation 3 of the Committee's report last year stated:

Recommendation 3: *The Committee recommends that on matters relating to spending in Wales, the Electoral Commission keeps in closer and more regular contact and provides detailed information on decision making in real time.*²⁷

34. In response, the Commissioner said:

“I think we have to admit that we were late in the day in coming to you with enough discussion about our upcoming budgets, some of which we wrongly kind of assumed to be obvious, and some of which we couldn't come to you on any earlier because of a lack of data. But I do think that, over the next six months, this is the chance for us to jointly look at the corporate plan that will take us over the next five years. And even then, there is a little bit of a problem because the corporate plan of the Welsh Senedd and the timing of the UK

²⁵ [Report of the Llywydd's Committee: Scrutiny of the Electoral Commission's financial Estimate for 2024-25](#)

²⁶ [Letter from the Electoral Commissioner for Wales following scrutiny of the Electoral Commission's financial Estimate for 2025-26](#)

²⁷ [Report of the Llywydd's Committee: Scrutiny of the Electoral Commission's financial Estimate for 2024-25](#)

*Government's corporate plan are not aligned—they're a year out. So, the more we understand each other's challenges, the better."*²⁸

35. The Head of Electoral Commission in Wales, Rhydian Thomas Wales, built on this saying:

*"... in terms of direct communications with the Llywydd's Committee itself, we did send you a comms plan following on from the meeting, the scrutiny session last November, which outlined quarterly in-person briefings and quarterly written briefings to the committee, as well as additional activities, and I think we've stuck to that. We would have, possibly, liked to have done more over the course of the summer just gone, but the general election came along and, I think, took us all by surprise to a degree. But what we propose is, we would send the committee, once again, a revised comms outline for the coming year, and we'd really welcome having discussions with you, especially on our planning work for the Senedd elections, and part of that, of course, will be relating to the campaign and the household booklet and everything else. So, we'd want the plan to be enhanced, moving forward."*²⁹

Budgetary cycles and challenges

36. In her opening remarks the Commissioner emphasised the challenges associated with providing the Committee with solidified figures for its Estimate within the statutory deadline of 30 September. The Commissioner stated:

*"... the first one, is the lack of synchronisation between the budget setting of the commission to the UK Government in Westminster, which happens at the end of March 2025, and the need for us to bring a budget to you on 30 September, which is actually even before the autumn budget of the UK Chancellor. And as you will have noticed, there were things like increased national insurance et cetera this time round, which we couldn't have anticipated."*³⁰

²⁸ RoP, 4 November 2024, paragraph 26

²⁹ RoP, 4 November 2024, paragraph 29

³⁰ RoP, 4 November 2024, paragraph 12

37. The Commissioner expanded on this, saying:

“Secondly, you have an aversion, and I completely understand the aversion, to any form of supplementaries. And so what we are trying to put forward is an envelope that might account for some changes. So, there will be some fluidity within our Estimate....

... So, we are doing our best and being as reasonable as possible, but I think, at some point, we have to have some sort of panel, perhaps, or a get-together to understand exactly the challenges of setting this budget before 30 September, and coming to you well before that, say in July, with even more floating numbers.”³¹

38. The Committee also heard that in general terms, the Commission's request for funding will reflect the electoral cycle, whereby its Estimates will be higher in the year running up to, and the year of, an election. The Head of Electoral Commission Wales described the split of costs pre and post-election, saying:

“Whenever there's a May poll, that means that the voter registration deadline falls in early to mid April. We run the majority of the campaign in March, but that campaign does bleed into the first half of April, as well as the booklet itself, so that's why we have to cover two financial years. Again, the majority of the work—two thirds of the work—would be in the first financial year, and the rest of it in April, in essence, and a couple of days, maybe, in May.”

39. The Commissioner, in relation to budgetary spikes, pointed out that a pattern of behaviour will emerge over time which will inform the Committee of future budget requests. The Commissioner said:

“When this committee will have bedded in for about 15, 20 years and it has a corporate memory, I think it will reflect what the National Audit Office accounts reflect, actually, which is that in, shall we say, the years when we're all coping with core issues, our ask remains steady, but that there will be a spike during a local government election, and there will be a spike during a Senedd election. And so, when you see that pattern

³¹ RoP, 4 November 2024, paragraph 13

over time, I don't think that this sort of ask will come as a surprise to the committee—it will come as the normal pattern of events.

Supporting delivery of the Senedd election in 2026

40. The Commission notes the “2025-26 Estimate for direct costs attributable to the Senedd includes a sum of £1,215,878”.³²

41. Its work in Wales in the coming year includes ensuring changes currently before the Senedd affecting how the election will be administered and regulated are delivered efficiently and effectively and understood, which “will be achieved through the drafting and delivery of detailed guidance for those involved in the running of the election and those wanting to take part”.³³

42. The Commission will develop and publish standard guidance for all partners, and construct new resources where required.

Voter engagement and public awareness

43. The Commission states “the 2025-26 Estimate includes £1,025,000 to cover the costs in the first year of a two year campaign for activities to raise awareness of the 2026 Senedd election”.³⁴

44. It has budgeted £650,000 for a public awareness campaign to cover the creation of Senedd specific assets, media buying and tracking research. The Commission will also produce and deliver a bilingual information booklet to all households in Wales costing £375,000. These costs together make up 87 per cent of the net increase in its budget for 2025-26 compared with 2024-25.

45. The Commission will focus on leading the development of a suite of public awareness materials including a voter information booklet that will be delivered to all households in Wales, containing information on how to vote under the new system. In addition, it will run a paid voter registration campaign and develop accompanying assets targeted at 16-17-year-olds and foreign nationals living in Wales.

³² [Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission](#)

³³ [Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission](#)

³⁴ [Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission](#)

46. In its Annual Report for 2023-24³⁵, the Commission outlined its ongoing and future work, which included the introduction of a new partnership grant scheme, which will “provide funding for projects that aim to increase knowledge and understanding of the democratic system amongst under-registered groups”.

47. When asked during scrutiny of the Commission's 2024-25 Estimate what work the Commission was doing with foreign nationals to ensure they fully understand the system and their rights to be able to participate in our democracy, the Head of the Electoral Commission in Wales, said:

“It’s always been a trickier audience, as I think Welsh Government have recognised previously, but we’ll continue to work with the Welsh Government. The tricky element is actually identifying the groups within our communities, and I know we’ve tried to work with Members, for example, because they will have the information relating to where these groups are, and with local authorities to identify the groups. It’s been a trickier audience, but we’ll continue to work with the Government and with local authorities to (a) identify them and (b) get the material out to them that they need in order to register and then to vote.”³⁶

48. In its written submission to the Committee, the Commissioner explained what it intended to do to identify foreign nationals and to support these groups in registering to vote. She said:

“We will utilise the 2021 Census data and information held by local authorities to pinpoint areas where there is a higher concentration of foreign nationals living in Wales. We will then work with the Senedd 2026 Communications Group, local authorities and relevant partner organisations to assist in the work of identifying these communities and discuss effective ways of engaging with them.

As part of our responsibility to monitor the performance of Returning Officers, we will look at public awareness activities

³⁵ [The Electoral Commission Annual Report and Accounts 2023-24, Wales Annual Report](#)

³⁶ RoP, 7 November 2025, paragraph 148

undertaken by local authorities to reach under-registered groups including foreign nationals.”³⁷

49. In its 2025-26 Estimate, the Commission highlights its programme of democratic education is now in its fourth year, saying:

“... this is an increasingly important area of our work and aims to affect a steady and profound change to engagement in the democratic process amongst young people.”³⁸

50. When asked to elaborate on the impact of this work and how the Commission intended to move forward with this work, the Commissioner stated that they gather feedback from “teachers, young people and partners via evaluation surveys”. The Commissioner went on to say that they will be developing new resources and guidance ahead of the 2026 election to reflect the changes to the system and that they will also:

“... launch a teacher training programme to increase knowledge and confidence amongst teachers. We will ensure our work is fit for purpose by utilising our Youth Voice panel and Teachers’ Forum to gain input on this work from young people and teachers across Wales.”³⁹

51. It will also continue to support under-registered groups to increase their knowledge, understanding and confidence to participate in the democratic system through funded partnerships, alongside smaller informal pieces of work supporting its registration campaign, and voter engagement work more broadly.

52. The Committee sought clarification on how the Commission intends to engage with under-registered groups, the Director of Communications explained that 70 per cent of the paid-for advertising budget would be weighted towards targeting under-represented groups in the voter registration campaign, whereas 30 per cent would be weighted towards a mass-audience.

53. When probed further on whether the Commission felt that this split provided sufficient balance between encouraging under-registered groups to vote, and

³⁷ [Letter from the Electoral Commissioner for Wales following scrutiny of the Electoral Commission's financial Estimate for 2025-26](#)

³⁸ [Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission](#)

³⁹ [Letter from the Electoral Commissioner for Wales following scrutiny of the Electoral Commission's financial Estimate for 2025-26](#)

communicating the electoral changes coming into to force to the wider electorate, the Director of Communications said:

*"... one of the things that we measure is campaign recognition, and we are starting to see that with some of the under-registered groups, such as, for instance, young people and also some people from ethnic minority groups. We're seeing that campaign recognition is better. So, this weighting does appear to be working."*⁴⁰

Electoral reform

54. The Commission set out its role to provide "expert advice and constructive challenge"⁴¹ in relation to the next set of devolved elections. This will ensure that the changes being introduced can be successfully delivered for voters, electoral administrators and campaigners.

55. It will provide advice and support to the Welsh Government as it develops a new Conduct Order for 2026, as well as the other pieces of secondary legislation that will be required to implement the electoral reform agenda.

56. In her opening remarks to the Committee, the Commissioner set out her position on the impact the reform agenda will have on the Electoral Commission in Wales, saying:

"This is obviously, in your eyes, an exceptional year, because our budget, our ask, is substantially higher, but obviously as well you don't need me to remind you that this is going to be an election year, in 2025-26, and that you as a Senedd have also maximised the number of elected representatives, you have changed the boundaries, and, more than anything, you have changed—. What I would say is you have made an almost generational change in the voting system that is going to be used in Wales. So, it comes as no surprise that this is a year in which our budget will spike."

⁴⁰ RoP, 7 November 2025, paragraph 47

⁴¹ [Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission](#)

57. The Committee asked the Commission what percentage of the additional funding is a consequence of electoral reform. The Head of Electoral Commission in Wales explained:

“The detail we provided in the regulatory impact assessment and the detail we were asked to provide related to new activities and responsibilities placed on the commission as a result of the legislation. There may be some new activities, there may be some new work that we’ll need to do, and these mainly relate to guidance, given the change to the voting system. But in terms of public awareness, this is not new activity, it’s existing statutory activity and we’d be presenting the committee with this area of work and these costs even if the legislation hadn’t been passed. This has been our approach to campaigning since 2011, 2016 and 2021...”⁴²

58. The Committee pressed for further assurances that the costs associated with electoral reform would be minimal and asked again what the implications would be on the Estimate had the new legislation not been introduced, the Head of Electoral Commission in Wales reiterated that “it would be the same Estimate”. He went on to say:

“The costs are for the campaign and for the booklet. We would still be running this campaign and we would still be producing a booklet, even if this legislation hadn’t been presented.”⁴³

59. The estimate also covered the Commission’s work with the Welsh Government and participating local authorities on the development of automatic registration pilots. A formal evaluation of these pilots will be published as part of its statutory responsibilities under the Elections and Elected Bodies (Wales) Act 2024.⁴⁴

60. Responding to the Committee’s request for further information on the cost implications of the development of automatic voter registration, the Commissioner set out in her submission that the Welsh Government and the four pilot authorities are leading on this work over the course of 2025. The role of the Commission is limited to providing the “formal evaluation of the pilots, which we

⁴² RoP, 7 November 2025, paragraph 80

⁴³ RoP, 7 November 2025, paragraph 88

⁴⁴ [Elections and Elected Bodies \(Wales\) Act](#)

will complete by the end of the year, and which will include gathering relevant public opinion data where possible." The letter went on to state:

*"We have requested £10k for this work, based on previous experience of running evaluation research, and any unused funds will not be drawn down. If it is useful to the Committee, we will work with the Welsh Government to prepare a written note on the detail of the pilots and provide this to the Committee in early 2025."*⁴⁵

Committee Views

61. The Committee is content that the Estimate put forward for the next financial year is a fair reflection of the activities it intends to undertake in preparation for the Senedd 2026 election. We understand that in the year running up to an election, the Electoral Commission's Estimate is likely to be significantly higher. We also appreciate that, as a consequence of Senedd and electoral reform legislation, this will have a considerable impact on certain elements of its work in the forthcoming financial year. However, we are concerned that given such a significant increase in its request, the Commission did not consider potential costs relating to electoral reform in its Corporate Plan for Wales.

62. In relation to the Commission's budgetary spikes, which coincide with the run-up to an election year, we agree with the Commissioner's assertion that these trends will become more apparent to the Committee over time and that the data will be useful comparators in future. However, without a direct comparison with previous electoral cycles, the Committee would like more information on whether it is the Commission's intention to use this year's Estimate as a baseline for future requests in election years.

63. The Committee is pleased on the whole that the recommendations put to the Commission following last year's scrutiny of its accounts have been taken on board, and we are generally satisfied that it has provided a more transparent Estimate for next year's funding request. However, we are concerned that the break-down of costs is still lacking in detail. For example, it is not clear how core business costs and direct event costs have been allocated in the Estimate. We appreciate that there will always be an element of fluidity in Estimates of this nature, but the Committee feels that too much weight has been placed on this and would urge the Commission to provide a detailed analysis of its planned

⁴⁵ [Letter from the Electoral Commissioner for Wales following scrutiny of the Electoral Commission's financial Estimate for 2025-26](#)

spending. We would recommend this as best practice when submitting future Estimates, allowing us to scrutinise costs fully.

64. We welcome the efficiencies made to reduce the Wales contribution to the Commission's core budget, and we are pleased that following on from the Committee's recommendation last year to develop a "set of measurements to evaluate whether the increased investment in regulation offers value for money", progress is being made in this area.

65. In comparison to previous years, we are satisfied that the Commission has responded to the Committee's recommendation that it communicates its decision making to us in a timely manner. We believe that transparency is key to facilitate scrutiny and we would encourage the Commission to meet with us formally on a more regular basis to provide updates on its planned work as it evolves, especially in the run-up to the 2026 Senedd election.

66. The Committee is sympathetic to the challenges posed by the timing of the UK and Welsh Government Budgets and the impact this has on all Directly Funded Bodies to provide their Estimates by the statutory deadline. The Senedd's Finance Committee is currently conducting a review of the Budget Process Protocol in consultation with the Cabinet Secretary for Finance and Welsh Language, and we would urge the Commission to put forward its views on this matter.

67. The accompanying narrative to the Estimate sets out the number of ways in which the Commission will support the electoral reform agenda, however, it is not clear to the Committee how the specific costs associated with this work is illustrated in the Estimate. We heard evidence that Senedd Reform is unlikely to have any effect on the funding being requested, however we also heard that with "an almost generational change in the voting system that is going to be used in Wales...it comes as no surprise that this is a year in which our budget will spike". The Committee would therefore like further assurances that the costs associated with electoral reform will be minimal.

68. Whilst we welcome the information presented to the Committee is at the higher end of its Estimated costs, we would like a commitment from the EC that the additional funding for direct event costs will be ringfenced for the 2026 Senedd election, and that any underspend will be returned to the Welsh Consolidated Fund. It is our expectation that, should there be an underspend in one area of work, the remaining funds will not be re-allocated to other areas.

69. The Committee wrote to the Commission following the oral evidence session on 4 November, asking for further information on its voter engagement work, particularly in relation to 16-17 year olds, foreign nationals and under-registered groups. The Committee was encouraged to hear about the various ways the Commission will be leading on this work and how it will consult with partner organisations to engage with these groups. We do however have some reservations about the weight given to the paid-for advertising campaign targeted towards under-registered groups, and that this may come at the expense of explaining the changes to the Senedd elections to the wider electorate. We would therefore like to be kept updated about how this work is progressing, and how the Commission intends to measure its impact.

70. The Committee is grateful for the information the Commission has provided in relation to the cost implications of developing automatic registration pilots, and for its offer to provide a written note on the detail of the pilots in early 2025. We would appreciate an update on how this work is progressing in due course.

Conclusion 1. Subject to the conclusions and recommendations to this report, the Committee is content that the financial Estimate for 2024-25 is consistent with the economical, efficient and effective discharge by the Commission of its functions in relation to devolved Welsh elections and devolved Welsh referendums.

Recommendation 1. The Committee recommends that future Estimates make clear the allocation of funding to core business costs and to direct event costs.

Recommendation 2. The Committee recommends that the Commission provides a breakdown of costs of the various activities related to the Senedd 2026 election, and provides the Committee with an update of any underspend predicted in these areas.

Recommendation 3. The Committee recommends that the Commission provides further information on how the Estimate for 2025-26 is likely to compare with future financial years which include Senedd and local elections.

Recommendation 4. The Committee recommends that the Commission communicates regularly with the Committee throughout the year, and appears again before the Committee in a formal capacity and outside of its annual scrutiny session, to provide updates on its planned work in the run-up to the 2026 election.

Recommendation 5. The Committee recommends that the Commission puts forward its views to the Senedd's Finance Committee on the challenges posed by the timing of the UK and Welsh Government Budgets, and the impact this has to provide their Estimates by the statutory deadline, so that they can be incorporated into its review of the Budget Process Protocol.

Recommendation 6. The Committee recommends that the Commission commits to:

- ringfencing additional funding for direct event costs to activities associated with the 2026 Senedd election;
- drawing down only what is necessary from the Welsh Consolidated Fund;
- returning any underspend to the Welsh Consolidated Fund; and
- providing assurances that, should there be an underspend in one area of work, the remaining funds will not be re-allocated to other areas.

Recommendation 7. The Committee recommends that a further break-down of costs are provided, to demonstrate the consequential costs, if any, associated with Senedd Reform which are in addition to an 'ordinary' election year.

Recommendation 8. The Committee recommends that the Commission provides updates to the Committee on:

- how its engagement work with under-registered groups is progressing; and
- how it intends to measure the impact the paid-for advertising campaign is having on both under-registered groups and the wider electorate.

Annex A: The Financial Estimate for 2024-25

Senedd Costs	23-24 Bid	2024-25 (£000s)	2025-26 (£000s)	Variance (£000s)	Variance (%)
Direct Costs (pay and non-pay)					
Devolution, Governance and Law					
Legislation Strategy and Coordination	0	22	11	-11	-51%
Commentary					
This represents the Committee's share of the costs that are associated with centrally managing and co-ordinating the delivery of changes arising as part of the programme of electoral reform in Wales; this includes ensuring that teams across the Commission are supported in planning for, and implementing any changes required in light of legislative changes.					
Wales	366	293	40	-254	-87%
Commentary					
This represents the Committee's share of the costs for us to :- support the development and implementation of new Senedd and electoral reform legislation; make ROs/EROs, administrators and candidates and agents aware of the new guidance and resources; monitor the performance of ROs/EROs in Wales and respond to their queries for advice and guidance; advise the new Electoral Management Board and other stakeholder groups reflecting both EC and Welsh stakeholder views; launch a Cross-Party Group within the Senedd to discuss issues relating to Welsh democracy; support the regulated community in Wales to meet statutory requirements and help new political parties and non-party campaigners to register; draft and lay new Codes of Practice on election spending for parties and candidates ahead of the Senedd elections in 2026; support political parties and deliver training sessions ahead of the Senedd election in 2026 to ensure compliance with the new rules; support the development and delivery of public awareness information in Welsh and English ahead of the 2026 Senedd election, and continue to comply with Welsh Language Standards set by the Welsh Language Commissioner;					

Senedd Costs	23-24 Bid	2024-25 (£000s)	2025-26 (£000s)	Variance (£000s)	Variance (%)
run an integrated voter registration and information campaign, ensuring voters in Wales are registered to vote and understand the changes to the Senedd voting system, including a paid voter registration campaign, household information booklet and promotional assets for local authorities and partner organisations; update and develop our democratic education resources and support to teachers ahead of the Senedd election in partnership with the Senedd Commission and based on requirements identified by our youth voice network and newly established Democratic Education Teachers' Forum; lead on the accountability arrangements to the Senedd and Llywydd's Committee ensuring all information is provided and statutory deadlines are met, keeping key partners in the Senedd and Welsh Government involved.					
Legal	80	102	55	-47	-46%
Commentary This represents the Committee's share of the total cost of providing legal support to the Commission's advice, guidance and regulation functions. It also includes supporting the development of any policy recommendations, as well as providing general and on-going legal advice on Welsh legislation and support of the Commission's functions as they relate to Wales (including registration, regulation, policy, electoral administration, governance and compliance with Welsh Language Standards). This work includes advising on proposals for electoral reform in Wales and ensuring that the Commission fulfils its accountability obligations to the Senedd.					
Governance			20	20	0%
Commentary This represents the Committee's share of the total cost of providing corporate governance services across the Commission. This cost covers support for implementing the Commission's corporate governance framework and supporting the Commission Board with oversight and discharge of the Commission's governance responsibilities. The UK parliament meets the cost of Commissioner's fees.					

Senedd Costs	23-24 Bid	2024-25 (£000s)	2025-26 (£000s)	Variance (£000s)	Variance (%)
Electoral Administration and Regulation					
Support and Improvement	18	18	16	-2	-12%
<p>Commentary</p> <p>This represents the Committee's share of the costs associated with supporting the monitoring and support of EROs and ROs in the delivery of their statutory electoral services. It also includes undertaking a full review of the current Performance standards for EROs and ROs, in light of legislative changes arising from electoral reform in Wales, to ensure that the changes are appropriately reflected in the performance standards frameworks, and to support their implementation.</p>					
Guidance	45	45	43	-2	-5%
<p>Commentary</p> <p>This represents the Committee's share of the costs associated with providing advice in response to queries from Returning Officers/Electoral Registration Officers and electoral administrators throughout the year. It also includes the cost of managing and updating guidance arising from legislative change as part of the programme of electoral reform in Wales; this includes updating our suite of core guidance and resources for electoral administrators and candidates and agents as needed.</p>					
Registration & reporting	72	77	49	-28	-37%
<p>Commentary</p> <p>This represents the Committee's share of the costs for the work relating to the statutory financial reporting required by registered political parties in Wales. The reports include quarterly donation and loans reports, and annual Statement of Accounts submission. It also represents that share of the costs relating to the annual renewal of registered party details and any changes to registration details made throughout the year.</p>					

Senedd Costs	23-24 Bid	2024-25 (£000s)	2025-26 (£000s)	Variance (£000s)	Variance (%)
Monitoring & enforcement	65	73	55	-17	-24%
Commentary					
This represents the Committee's share of the costs that are associated with compliance and enforcement work arising from parties and campaigners in Wales. This includes monitoring the campaign activity of parties and campaigners in Wales. Our monitoring work helps us to identify campaigners who may need our support to come into compliance. It also supports out intervention and enforcement work, if it is required. We also work closely with the Single Point of Contact (SPOC) within each Police Force area to provide advice and guidance during the election period.					
Regulatory support	50	56	43	-13	-24%
Commentary					
This represents the Committee's share of the costs associated with developing guidance for parties, candidates and agents. It also includes supporting the programme of electoral reform in Wales and updating our resources in light of legislative changes or feedback. We also provide a year-round advice and support service which is tailored and targeted to individual stakeholder needs. This will to ensure the regulated community has an understanding of the laws, their obligations and aims to support high levels of compliance. As part of this we offer bespoke training, advice surgeries, and run webinars.					
Communications Policy and Research					
Campaigns & Corp Identity	41	46	1112	1065	2309%
Commentary					

Senedd Costs	23-24 Bid	2024-25 (£000s)	2025-26 (£000s)	Variance (£000s)	Variance (%)
This represents the Committee's share of business as usual activity for paid for media campaigns in the lead up to the 2026 Senedd elections. This will focus on the registration campaign, and will provide voter information booklets delivered to each household in Wales.					
Digital Communication & Voter Engagement	78	78	171	93	120%
<p>Commentary</p> <p>This represents the Committee's share of the costs of the Commission's Digital Communications and Voter Engagement team based on our Estimate of how their time will be spent. We will continue to run a Youth Voice network for Wales, and our youth voice partner will continue to undertake consultancy work with young people across Wales, getting their feedback and input on our resources to ensure they are effective and fit for purpose. We will also continue to build on our existing political literacy work by digitising our teacher and youth practitioner training, make further improvements to our resources for voters with accessibility needs and provide support to voters who register anonymously. We will also scale up projects support under registered communities to engage in democracy. This also covers our digital communications work. Our Digital Communications team develops and maintains our bilingual website, digital tools, and social media channels. There will be a greater focus on producing content for Wales and in Welsh language ahead of May 2026 elections. They will also be supporting teams across the Commission to publish information in English and Welsh for our diverse stakeholders, including voters, electoral administrators and campaigners.</p>					
External communications	68	65	67	2	2%
<p>Commentary</p> <p>This represents the Committee's share of business as usual external communications activities, including media relations and public affairs support for team in Wales as they prepare for the 2026 elections and respond to legislation arising from the Government's electoral reform programme. The Commission will also be delivering its public information function to provide support and guidance to voters ahead of the 2026 elections.</p>					

Senedd Costs	23-24 Bid	2024-25 (£000s)	2025-26 (£000s)	Variance (£000s)	Variance (%)
Research	47	31	40	9	29%
Commentary					
This represents the Committee's share of business as usual research activities, including work to support the Welsh Government and Senedd by reporting on Welsh elections and undertaking statutory evaluation of planned pilot schemes of electoral registration without application.					
Policy	53	53	36	-18	-33%
Commentary					
This represents the Committee's share of business as usual policy activities, including work to support the Welsh Government and Senedd to consider new policy proposals and legislation arising from the Government's electoral reform programme including planned pilot schemes of electoral registration without application.					
Total direct costs	983	958	1754	796	83%
Indirect Costs					
Resource	304	515	648	133	26%
Commentary					
Impact includes (1) Favourable effects of attribution changes in 25/26 as more costs are based on population. (2) Non-pay inflation at 4% in line with forecast RPI (£39k). (3) IT increases are associated with overall growth in the size of the Commission and improving IT security, including additional roles needed in IT, the full year effect of changes in 2024/25 and continued focus on modernising technology. (4) The impact of growth in a number of teams associated with addressing gaps in capacity and capability including Finance, Procurement and HR (Apprentices, Recruitment Costs, Consultancy Costs for Pay Review and Additional Staffing) (5) flow through of 24/25 pay increases impacts at £25k increase.					

Senedd Costs	23-24 Bid	2024-25 (£000s)	2025-26 (£000s)	Variance (£000s)	Variance (%)
Depreciation	127	92	85	-7	-7%
Commentary Decrease driven by favourable apportionment partially offset by increase in assets.					
Pay Award 2025-26			45	45	0%
Commentary Based on 2.5% inflation and a provision of circa 2.7% associated with the pay review implementation					
Corporate Plan			211	211	0%
Total indirect Costs	431	606	988	382	63%
Total Contribution	1414	1564	2742	1178	75%