



# National Audit Office

Comptroller and Auditor General  
Gareth Davies

David Rees MS  
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Dear Mr Rees,

## NAO MEMORANDUM: PROGRESS IN ENGAGING YOUNG VOTERS IN WALES

I am pleased to submit to the Llywydd's Committee a memorandum in which my team has examined how The Electoral Commission (the Commission) has managed its role in engaging young voters in the 2021 Welsh elections.

We undertook this work in response to requirements under the Political Parties, Elections and Referendums Act 2000 (PPERA), as amended by the Senedd (and Wales) Elections Act 2020, to produce a report to the Llywydd's Committee on the use of resource by the Commission to discharge its functions in relation to devolved Welsh elections and devolved Welsh referendums. The report is now due in response to the production of both the Commission's financial estimate and its five-year Corporate Plan.

The memorandum considers how the Commission has managed its role in engaging young voters (aged 16-34) in Wales; it does not include a formal VFM conclusion. We have, where appropriate, highlighted practical considerations which the Commission could further develop to enhance its planning and reporting processes on future campaigns, as part of its new 2022-27 business plan. I hope you will find this report helpful to support discussions in the Committee's upcoming October meeting.

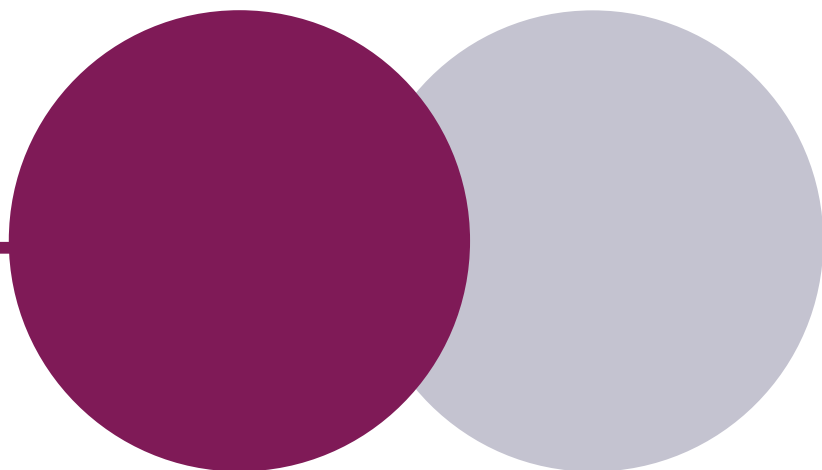
A Welsh translation of this memorandum will be circulated separately. The Director on this study, Liz Fox ([liz.fox@nao.org.uk](mailto:liz.fox@nao.org.uk)), would be happy to discuss further or answer any questions you might have.

Yours sincerely,

**GARETH DAVIES**



National Audit Office



# Progress in engaging young voters in Wales

The Electoral Commission


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**MEMORANDUM FOR  
THE LLYWYDD'S  
COMMITTEE**

by the  
National Audit Office

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OCTOBER 2021



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The Comptroller and Auditor General (C&AG), Gareth Davies, is an Officer of the House of Commons and leads the NAO. We audit the financial accounts of departments and other public bodies. We also examine and report on the value for money of how public money has been spent.

In 2020, the NAO's work led to a positive financial impact through reduced costs, improved service delivery, or other benefits to citizens, of £926 million.



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## Introduction

**1** The Comptroller and Auditor General (C&AG) is required under the Political Parties, Elections and Referendums Act 2000 (PPERA), as amended by the Senedd (and Wales) Elections Act 2020, to produce a report to the Llywydd's Committee (the Committee) on the use of resource by the Electoral Commission (the Commission) to discharge its functions in relation to devolved Welsh elections and devolved Welsh referendums (or, if the C&AG so determines, any of those functions). The report by the C&AG is due on production of both the Commission's five-year Corporate Plan and its financial Estimate.

**2** The Electoral Commission is the independent body that oversees elections and regulates political finance in the UK. The Commission seeks to promote public confidence in the democratic process and ensure its integrity. It was set up under the PERA to be independent of government and political parties and is directly accountable to the UK Parliament and to the devolved parliaments.

**3** The Commission monitors elections and referendums to make sure they are fair and run well, promoting public confidence in the democratic process. The Commission provides the guidance and advice that enables the delivery of elections, as well as setting performance standards for how they should be delivered. As part of this role, the Commission runs public awareness campaigns ahead of elections to encourage people to register to vote. For the 2021 elections in Wales, this has included campaigns and resources focused on newly enfranchised voters, following the legislative changes to extend the right to vote for elections to the Senedd to persons aged 16 and 17 and to qualifying foreign citizens. The Commission's five-year plan includes £1.3 million of funding for future digital communications and campaigns in Wales over the period 2022-23 to 2026-27.

**4** To support the Llywydd's Committee in its work, our memorandum considers how the Commission has managed its role in engaging young voters (aged 16–34) in Wales. We considered: the Commission's strategy and objectives for raising awareness, registration and engagement in young people in the 2021 elections; the supporting plans and governance arrangements; and any arrangements for monitoring and evaluating the outcomes and learning lessons. We have, where appropriate, highlighted practical considerations that the Commission could further develop to enhance its planning and reporting processes on future campaigns as part of its new 2022–2027 business plan.

**5** The content of this memorandum has been shared with the Commission to confirm that the evidence presented is factually accurate.

## Strategy and objectives

**6** In examining the Electoral Commission's (the Commission's) approach to engaging young voters we have considered the extent to which it has:

- developed clear objectives;
- used lessons learned from previous projects to inform the current strategy; and
- set out clear roles and responsibilities of partners and stakeholders.

### **Goals and objectives**

**7** The Commission aims to enable the continued delivery of free and fair elections and referendums and to make sure that registration and voting are accessible to all. A key part of this is the engagement of young voters, identified as individuals between the age of 18 and 34 years across the UK, and additionally those aged 16 and 17 years for Senedd and local government elections within Wales and Scotland.

**8** To support engagement of young voters, the Commission undertook a voter registration campaign ahead of the May 2021 elections. This campaign ran from March to April 2021 and had particular focus on influencing groups that have been traditionally harder to reach. In addition to its overall organisational goals, the Commission set specific objectives for its public awareness campaign for the 2021 elections in Wales. These objectives were:

- a primary objective of increasing voter registration ahead of the electoral event to ensure that those who wish to cast their vote are able to; and
- a secondary objective of raising awareness of upcoming elections and the electoral system.

**9** The delivery of these objectives was to be supported by the creation, distribution and promotion of an updated programme of educational resources for the voter. This included a set of resources aimed at 14–18-year-olds in Scotland and Wales ahead of the devolved elections.

## Use of lessons learned

### Strategy design

**10** The Commission's wider strategy to raise public awareness of elections and voting across the UK noted that its current plans were "based on the knowledge, expertise and extensive data it has built up each year, as well as the value for money shown by results of its past campaigns". In designing the Welsh Public Awareness Plan, the Commission:

- targeted its advertising at those who have failed to register due to lack of awareness or oversight, rather than those who are consciously disengaged, which it knew to be more effective;
- used research to support a primary focus on 18–34-year-olds for the campaign;
- drew on its learning that mass-media advertising had been less effective than communicating through organisations who already have a strong voice in the community; and
- used existing networks to draw on local authorities' specific knowledge of under-registered groups in their areas.

### Barriers to voting

**11** In 2020, the Welsh Government carried out exploratory research on how best to renew democratic engagement. This involved identifying the key motivations for, and barriers to, voting in Welsh elections and their importance to young people in Wales. Six main barriers were identified (**Figure 1**).

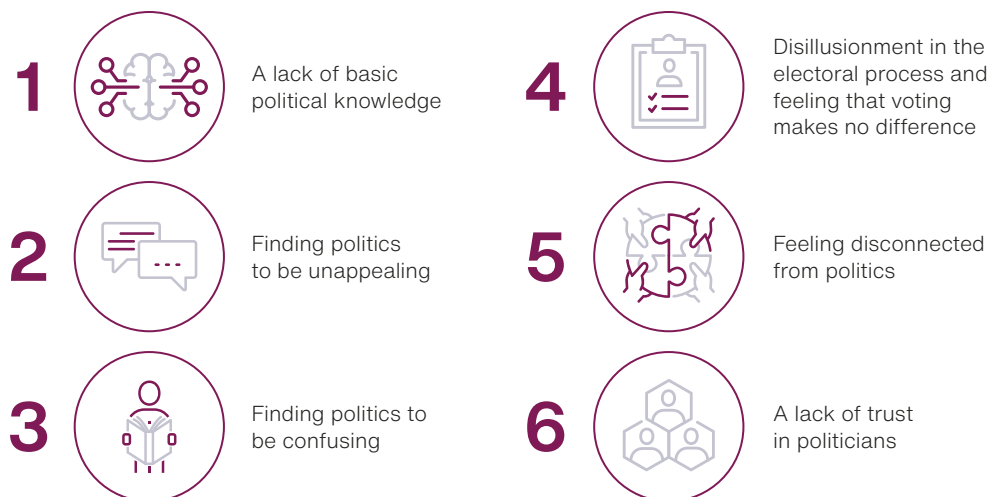
**12** Our review of campaign and press plans identified three main actions that the Commission has taken in response to these barriers. These are a public awareness advertising campaign, the provision of educational resources for local authorities and partners (including both a *Handbook for Educators* and a *Handbook for Young People*), and the production and delivery of a voting guide to every household in Wales. These initiatives addressed three of the six barriers the Welsh Government had identified (**Figure 2** on page 8).

**13** The Commission is responsible for activity to generate additions to the electoral register and uses information on barriers to inform its work. The Commission produced a detailed budget for the May 2021 elections with separate funding for initiatives in Wales. It allocated funding for activities including media campaigns, tracking research and production of educational resources. For Wales, this included £224,000 for media specifically targeting 18–34-year-olds and a further £30,000 for media specifically targeting 16–17-year-olds.

## Figure 1 Barriers to voting in young people in Wales

The Welsh Government identified six main barriers

The most common barriers identified were:



**Note**

1 The Welsh Government's sample to identify the barriers spanned four broad groups of participants: young people aged 14–17 (eight focus groups); disengaged adults aged 18+ (eight groups); foreign nationals (28 participants); and stakeholders (12 participants). Five focus groups were convened in Welsh. In total, 148 people took part in the research between late July and early November 2019 in Aberystwyth, Ammanford, Caernarfon, Cardiff, Newtown, Swansea, Torfaen, Welshpool and Wrexham.

Source: National Audit Office analysis of Welsh Government, *Renewing Democratic Engagement*, Exploratory Research

### Role and responsibilities – working with partners

**14** The Commission works with a range of partners including the Welsh Government, the Senedd Commission, local authorities, and other organisations including those who work with young people. It has produced a partnership plan, which outlines how it will execute its work with each partner organisation. It has identified that its partners and other stakeholders are best placed to target disengaged audiences who have made a conscious decision not to register to vote, as well as voters who need specific support and information to participate in elections. It has carried out stakeholder mapping exercises to ensure that it optimises the impact from its engagements with partner organisation.

## Figure 2

The Electoral Commission's public awareness campaign in Wales addressed barriers to voting seen in young people

Three of the six identified barriers to voting seen in young people were addressed by the Electoral Commission's (the Commission's) campaign

Barriers to voting in young people	Public awareness advertising campaign	Resources for local authorities and partners	Voting guide for households
A lack of basic political knowledge	✓	✓	✓
Finding politics to be unappealing			
Finding politics to be confusing	✓	✓	✓
Disillusionment in the electoral process and feeling that voting makes no difference			
Feeling disconnected from politics	✓	✓	✓
A lack of trust in politicians			

Source: National Audit Office analysis of Welsh Government, *Renewing Democratic Engagement* Exploratory Research

## Future considerations on strategy and objectives

**15** The Commission drew on existing work and lessons learned to help design its objectives. These objectives are clear and well-defined. The Commission also took appropriate action to help improve knowledge and clarity in the electoral process and address disconnection between voters and the election process.

**16** To support further increases in voter registration, the Commission should, while maintaining its impartiality, work with its partners to plan and deliver actions to address the remaining barriers to voting.

## Delivery and monitoring

**17** In examining the Electoral Commission's (the Commission's) approach to delivering and monitoring performance we have considered the extent to which the Commission has:

- key performance indicators (KPIs) that are suitably linked to campaign objectives;
- access to frequent, real-time data that allow it to monitor and evaluate progress in a timely manner, and take actions to help improve project delivery; and
- a risk management process that allows it to understand and mitigate campaign risk.

### Key performance indicators

**18** To ensure that delivery of the campaign is on track, the Commission sets and monitors progress against KPIs. The Commission has five KPIs aimed at 18–34-year-olds for its public awareness campaign (**Figure 3** overleaf). The minimum target for each KPI is based on past performance and considers resource allocation and spend in each campaign area.

**19** These indicators support both the primary objective of increasing voter registration and the secondary objective of raising awareness of upcoming elections and the electoral system. For the 2021 campaign, performance against these KPIs was broadly in line with identified targets.

### Using data and evaluation

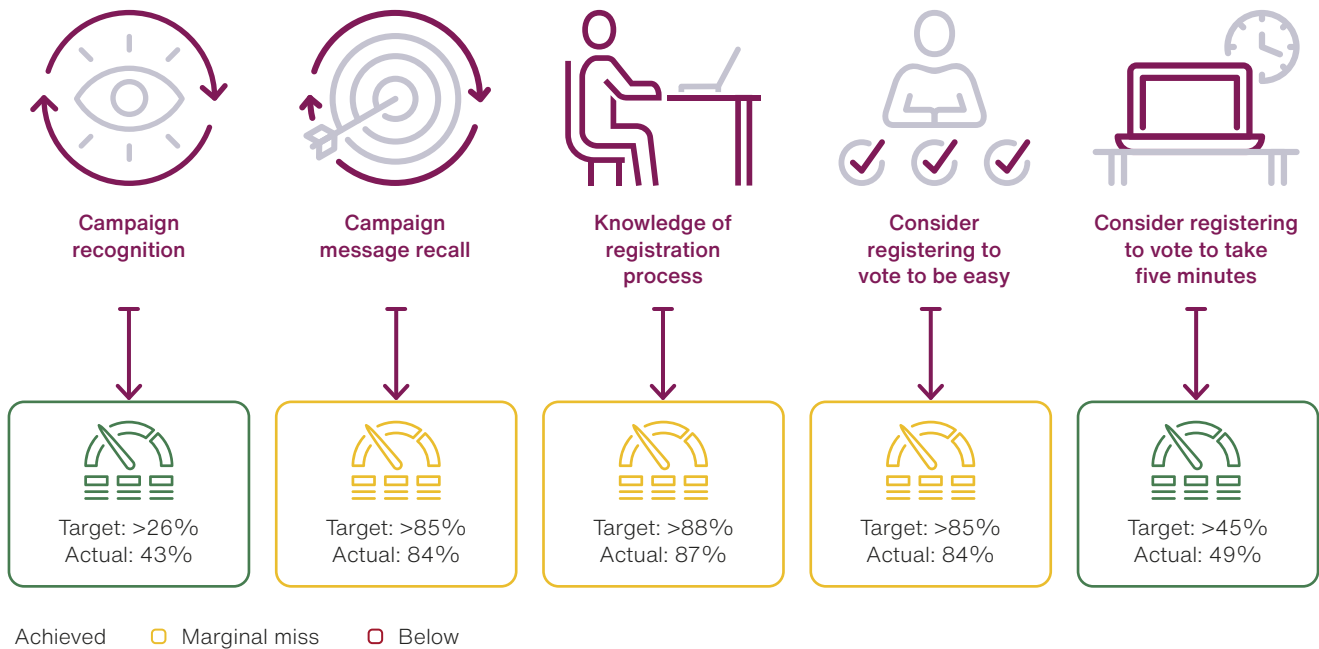
**20** The Commission carries out an evaluation after every campaign. For the Welsh public awareness campaign the evaluation considered:

- the number of applications by age;
- the number of articles published which referenced the Commission's key voter registration and voter information messages;
- the number of councils and local publications which made use of the Commission's press releases;
- engagement levels with social media posts; and
- campaign spend and campaign reach.

**Figure 3**

Key performance indicators (KPIs) of the Electoral Commission’s public awareness campaign in Wales

The Electoral Commission (the Commission) met two of its five KPIs for 18–34-year-olds that underpinned its public awareness campaign in Wales



**Note**

1 YouGov sample to assess the Commission’s performance against their KPIs comprised 614 respondents from Wales. The fieldwork ran from 21 April to 5 May 2021 and the samples were weighted to be representative of the population by age, gender, region, social grade and education level.

Source: National Audit Office analysis of YouGov evaluation data of the Electoral Commission’s public awareness campaign

**21** The Commission has monitored the performance of its campaign using a number of metrics – including recognition and recall of the campaign, and engagement (likes and clicks) with social media. It also has aggregate data on the final outcome of additional registrations. However, it lacks a link between the two, which would allow it to understand what works most effectively in removing barriers and encouraging registration.

**22** The Commission has access to daily voter application data and website traffic via the gov.uk dashboard, as well as data on the performance of its digital adverts. The data to assess performance against KPIs are, however, only available at the conclusion of a campaign and published as part of the Commission’s elections evaluation report.

## **Risk management**

**23** Commission staff held daily meetings throughout the live dates of the public information campaigns, alongside Senior Leadership meetings on a weekly basis. This was in addition to the regular meetings held by the Cabinet Office and Welsh Government, attended by staff from the Commission, to make sure that risks were accounted for and being appropriately mitigated. The Commission also established a sub-group of the Welsh Electoral Coordination Board to discuss communication plans and resource allocation between all relevant partners across Wales. This minimised the risk of decisions being taken in isolation to the detriment of other campaign areas.

**24** We also assessed the Commission's project risk register for its public awareness campaigns. It included nine identified risks and the potential impact of each risk had been considered. A minimum of two mitigation approaches had been provided for each, with most risks supported by four or more mitigation approaches. There was also a contingency plan in place for delays and overruns, setting out the latest possible date decisions could be made and the shortest possible timeframes that the Commission could realistically achieve.

## **Future considerations on delivery and monitoring**

**25** The Commission's KPIs were clearly linked to both its primary and secondary objectives. It had considered how best to monitor and evaluate campaign progress, and the Commission acts on the data it gathers to improve future performance.

**26** To support increased effectiveness in future voter registration campaigns the Commission should:

- consider whether it could make further use of real-time performance data from agencies and delivery partners. This will allow the Commission to take appropriate and efficient action, if necessary, during campaigns; and
- build on previous research on the impact of voter registration campaigns by exploring the potential for trials that link the data on individual voter registration outcomes to data from campaign tracking. This would provide more detailed evidence on what works in achieving additional vote registrations in specific geographical areas and sub-sets of young voters.

## Governance and learning

**27** To support appropriate governance arrangements and embedding lessons learned into future working, we considered:

- accountability arrangements, in particular for senior project sponsors;
- evidence of the Electoral Commission's (the Commission's) impact;
- communication of campaign results to share best practice and areas for future improvement across the organisation; and
- plans for drawing out and sharing lessons to inform future strategy.

### **Accountability arrangements**

**28** Within the Commission, the director of communications, policy and research is the senior responsible officer for the overall delivery of the public awareness campaign. Under their direction, the campaign team is required to submit plans to the Commission Board for each new project. These plans must be approved for a campaign to be able to proceed. We have reviewed the papers submitted to the Commission Board for both the Public Awareness campaign and the Political Literacy education campaign. Key topics covered in each board paper included:

- the strategy and purpose of the campaign;
- stakeholder engagement and partnership work; and
- how to measure the impact of the campaign.

**29** However, there was no formal requirement for project teams to report back in detail to the Commission Board once campaigns are under way. Project teams submit only a brief monthly update on campaign progress as part of the chief executive officer's report. This means that the Commission Board may not always have early sight of any issues which might affect the timeliness or effectiveness of a campaign.

### **Attribution of results**

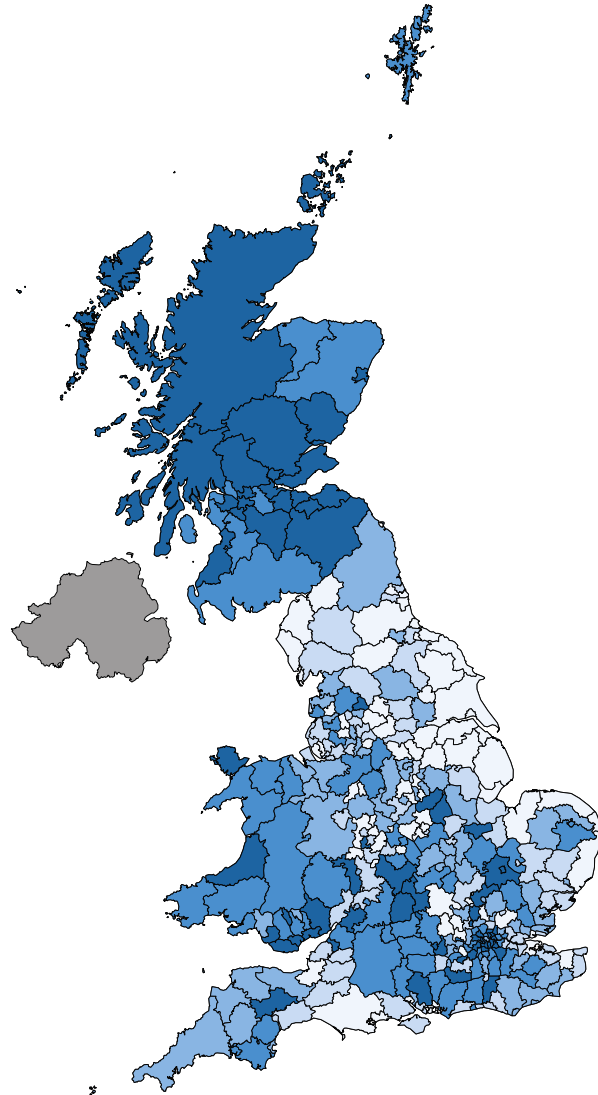
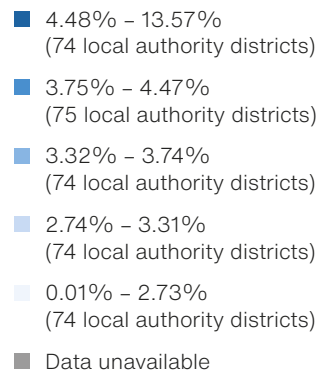
**30** The Commission had a target of generating at least 50,000 new voter applications in Wales over the duration of its campaign. It exceeded its target with final data showing 71,562 new voter applications, including 7,704 applications from 16-17-year-olds. Registration rates for new voters varied both by local authority district in Wales and across the UK (**Figure 4** and **Figure 5** on page 14). The applications data only include applications made during the timeframe of the Commission's campaign. However, given the number of factors influencing voter applications it is difficult to demonstrate the additional impact of the Commission's work.

**Figure 4**

## Recent voter registration among young adults (18–34-year-olds) in the UK, by local authority

The percentage of 18–34-year-olds who submitted an application to vote between 9 March and 19 April 2021, by local authority

Percentage of 18–34-year-olds who submitted an application to vote

**Notes**

- 1 The data supplied by the Electoral Commission for our use described applications submitted between 9 March and 19 April 2021 but was aligned with 2019 local authority boundaries, which include 371 local authorities in England, Scotland, and Wales.
- 2 The Electoral Commission did not provide data for Northern Ireland because there were no polls or voter registration campaigns carried out in Northern Ireland during this time period.
- 3 The percentage of 18–34-year-olds who submitted an application to vote (between 9 March and 19 April 2021) in the UK ranged from 0.01% to 13.57% and averaged 3.77% overall.
- 4 The total population of 18–34-year-olds in England, Scotland, and Wales was estimated by the ONS to be 14,196,998.

Source: National Audit Office analysis of voter registration data from the Electoral Commission and mid-year population estimates from the Office for National Statistics. Population data from ONS, Crown Copyright Reserved (from Nomis on 16 September 2021). Shapefile from Office for National Statistics licensed under the Open Government Licence v.3.0. Contains OS data © Crown copyright and database right (2021)

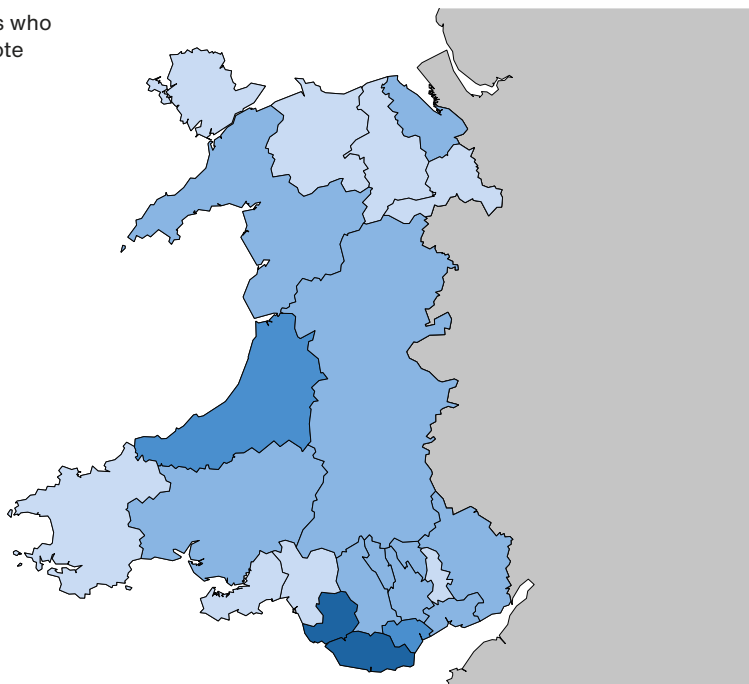
### Figure 5

#### Recent voter registration in Wales among 14–17-year-olds, by local authority

The percentage of 14–17-year-olds who submitted an application to vote between 9 March and 19 April 2021, by local authority

Percentage of 14–17-year-olds who submitted an application to vote

- 11.60% – 14.49%  
(2 local authority districts)
- 8.70% – 11.59%  
(2 local authority districts)
- 5.80% – 8.69%  
(10 local authority districts)
- 2.90% – 5.79%  
(8 local authority districts)
- 0.00% – 2.89%  
(0 local authority districts)
- No data available



#### Notes

- 1 For Senedd and local elections in Wales, a voter becomes eligible to vote at age 16. 15-year-olds and some 14-year-olds are entitled to be included on the register as attainers. For the purpose of the local government register in Wales, an attainer is someone who turns 16 by the end of the twelve months following the 1 December after the relevant date.
- 2 The data supplied by the Electoral Commission for our use described applications submitted between 9 March and 19 April 2021 but was aligned with 2019 local authority boundaries, which included 22 local authorities.
- 3 The percentage of 14–17-year-olds who submitted an application to vote (between 9 March and 19 April 2021) ranged between 4.47% and 14.49% and averaged 7.36% overall.
- 4 The total number of 14–17-year-olds in Wales was estimated by the ONS to be 137,883.

Source: National Audit Office analysis of voter registration data from the Electoral Commission and mid-year population estimates from the Office for National Statistics. Population data from ONS, Crown Copyright Reserved (from Nomis on 16 September 2021). Shapefile from Office for National Statistics licensed under the Open Government Licence v.3.0. Contains OS data © Crown copyright and database right (2021)

**31** Other data provide some evidence of the Commission's impact. The Commission's evaluation survey, carried out across Wales by YouGov after the campaign, found that 43% of 18–34-year-olds in Wales recognised at least one element of the Commission's campaign. When considering knowledge of the campaign's core messages in 18–34-year-olds, there was a noticeable increase when comparing the pre- and post-campaign data. The percentage of young people who knew that you need to be registered to vote increased from 78% to 84%, and the percentage of young people who believed that it took roughly five minutes to register to vote increased from 41% to 49%. The collection of both pre- and post-campaign survey results is one input in helping the Commission to consider the impact of its work.

### **Communication of findings**

**32** The Commission told us that its intranet blog is used to share regular updates by its Campaigns, Digital Communications and Learning, and the Wales teams. The full campaign evaluation report – which includes progress against targets, key performance measures and stakeholder survey results – was also circulated internally with the wider office. We consider this to represent good practice in sharing learning. The Commission also included a section on newly enfranchised voters in its election report, which was published on 14 September. This was a condensed version of the section on newly enfranchised voters in the evaluation report, which we have assessed as part of this memorandum.

### **Learning and sharing lessons**

**33** *Managing Public Money* highlights that it is essential to effective internal decision-making that arrangements are in place to draw out and share lessons learned. For the Commission, this means using the results of the 2021 campaign to inform future work, specifically on young voters and more widely on other awareness campaigns. We have reviewed the May 2022 paper to the Commission Board on public awareness campaigns across the UK for the May 2022 elections. There is clear evidence that findings from the May 2021 campaign have been used to inform future strategy. This includes using:

- campaign recognition scores to assess whether advertising concepts (such as the 'Got 5' concept) are still performing well and should be re-used;
- engagement data to consider the performance of paid digital advertising and amend target audiences; and
- application data for newly enfranchised voters to establish a baseline and develop young voter application targets for May 2022.

### **Future considerations on delivery and monitoring**

**34** The Commission held regular monitoring meetings with both delivery agencies and partners throughout the campaign period, as well as fortnightly internal meetings with all workstream leads. The Commission also met its target of adding at least 50,000 new voter applications in Wales throughout the campaign period and used findings from this campaign to inform future strategy.

**35** To support further increases in voter registration and accountability, and because raising voter awareness is a priority, the Commission should:

- review current reporting arrangements for campaigns with the Commission Board and Executive to ensure that arrangements are best placed to support accountability; and
- consider producing a more detailed evaluative report of progress in registering 16–17-year-olds in Scotland and Wales that includes measures against each of the five overall KPIs that were identified for 18–34-year-olds.

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