

David Rees MS  
Chair, Llywydd's Committee  
Senedd Cymru  
Cardiff  
CF99 1NA

30 September 2024

Dear Chair,

### Electoral Commission Annual Estimate for 2025-26

I am pleased to enclose the Electoral Commission's Annual Estimate for the 2025/26 financial year in relation to our devolved Welsh activities, including core business, direct event costs and additional Corporate Planning project work which totals £2,742,123 (see table below for comparison with the budget in 2024/25).

Wales	24/25 £k	25/26 £k	Variance
Core	£ 1,441	£ 1,315	-8.7%
Event	£ 124	£ 1,216	883.5%
CP		£ 211	
Total	£ 1,564	£ 2,742	75.3%

### Strategic frameworks

As you will be aware, our estimate is underpinned by our five-year Senedd Corporate Plan on devolved Welsh functions. The current plan runs from 2022/23 to 2026/27 and can be found [here](#). A new Welsh Corporate Plan will be drafted, consulted on and laid following the 2026 Senedd elections.

Following the recent UK Parliamentary general election, we are also required to develop a new UK five-year plan to be submitted to the Speakers Committee alongside the main 2025/26 estimate. Currently this plan must be submitted at the same time to the Scottish Parliament Corporate Body (SPCB) for consideration of the parts which relate to our Scottish devolved functions. We are, however, also conscious of the provisions contained within the Scottish Elections (Representation and Reform) Bill currently being

considered in the Scottish Parliament which, assuming it passes and is commenced, will require us to submit a five-year plan after a Scottish Parliament election.

We are therefore in a situation where we have, or will have, three separate plans reflecting our three statutory responsibilities derived from the Senedd, UK and Scottish Parliaments. While some things will be different, reflecting the contexts of each jurisdiction, many of the overarching themes of supporting voters; modernising the electoral system while protecting our democracy and tackling the threats it faces are common to all – and we will make sure they are consistent. We aim to play our part in ensuring the resilience of the wider democratic system and building a stronger Electoral Commission to achieve that.

Over the coming year in Wales, we will concentrate on delivering the new changes to the Senedd elections in 2026, as set out below. We will also start work to deliver the objectives and goals to be included in the UK Corporate Plan which we will publish in 2025. This work will inform the development of the Welsh Corporate Plan and will similarly be considered as we develop a Scottish Corporate plan post May 2026 for consideration by the Scottish Parliament Corporate Body.

We have followed the Statement of Funding Principles noted in 2021 by each of the three funding bodies which requires that the directly attributable costs of elections, and of other separately identifiable activities under the powers of each legislature should be funded by that body, while expenditure that is not directly attributable is to be shared on a population basis in each nation.

The funding formula for the proposed bid for funding has been adjusted year-on-year to more accurately reflect the population sizes of each of the three parliaments using ONS data. The Commission's core costs for shared activity – such as the ongoing support to voters, administrators and the regulated community, as well as the corporate costs necessary for the operation of the Commission – are allocated on a formula based on population estimates using ONS population statistics. The allocation to Wales is 4.6%, with 8.1% allocated to Scotland and 87.3% allocated to Westminster. Where there is a specific demand for additional work solely impacting Welsh stakeholders, i.e. the May 2026 Election, these costs are 100% allocated to the devolved parliament.

In the Estimate, using the above formula of 4.6%, we have calculated that the Llywydd's Committee's share of core costs is £1,315,496. For Wales, this means a lower contribution to the Commission's core costs as compared to 2023/24.

We recognise the financial climate in which this estimate is made but feel we can justify our request given the tasks faced and the importance of our democracy. Our [Annual](#)

Public Attitudes Tracker survey revealed that only 33% of the public in Wales were satisfied with the way democracy works in the UK.

We seek to explain why our estimate has been submitted below and look forward to discussing it with you at your convenience.

## Our proposed programme of work in 2025-26

### **Continuing our core activities**

Like many organisations, the Commission faces increased costs due to pay increases and non-pay inflationary pressures. 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, set out below. We will continue our regulatory, guidance, evaluation, research, campaigns and communications work, in particular after the 2024 UKPGE, and to prepare for the 2026 elections.

### **Supporting delivery of a well-run Senedd election in 2026**

The focus of the Commission's work in Wales in the coming year, and reflected in our estimate, sets out how we plan to manage our work effectively leading to the Senedd election in 2026. This includes ensuring changes currently before the Senedd affecting how the election will be administered and regulated are delivered efficiently and effectively and understood by all those involved, voters, parties, candidates, agents and administrators. This 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.

We will build on our experience and expertise in this field not only in developing and publishing standard guidance for all partners, but also to construct new resources where required, for example, in supporting the Welsh Government's work on candidate selection following on from the withdrawal of the Senedd Cymru (Candidates List) Bill. We will facilitate tailored briefing sessions explaining the changes and how they can be effectively implemented with all relevant partner groups. As part of this process, we will also evaluate the impact of these changes and the broader electoral process and consider this area as part of the statutory post-poll report which will be published in 2026/27.

Such activities are attributable to the cost of the Senedd election and funded directly by the Llywydd's Committee. As we have indicated previously the funding of the Commission can be seen as having a five-year cycle. Activities related to devolved elections can span across financial years. The year prior to a Senedd election has on average two-thirds of the direct cost of the election. The following financial year sees the remaining third-of the Senedd election and two-thirds of the local authority elections direct costs. The year after that sees the final third of costs directly attributable to the council elections. Thereafter the next two financial years have relatively little directly attributable costs to elections.

The 2025-26 estimate for direct costs attributable to the Senedd includes a sum of £1,215,878.

### **Voter engagement and public awareness**

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

Working in partnership with the Senedd Commission and the wider electoral community we will ensure that voters are aware of the changes to the Senedd electoral system. We 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, we will run a paid voter registration campaign and develop accompanying assets targeted at 16–17-year-olds and foreign nationals living in Wales.

We will utilise our civic society partnerships to support our campaigns and develop new partnership projects that increase knowledge, understanding and participation of the democratic system amongst under-registered groups in Wales. Our programme of democratic education is now in its fourth year, and 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.

We will continue to develop our democratic education resources for teachers and learners in Wales ahead of the 2026 election, reflecting the changes to the system. This

will include the further development of our training offer to support teachers' continuing professional development. In Wales, public trust in teachers remains consistently high at 71%, making them a key partner in delivering public awareness.

We will work with our youth voice partner, Children in Wales, to gather input from young people via our youth voice network so that we can ensure our education resources effectively meet their needs. In addition to this, we will continue to work in partnership with civic society organisations in Wales to support under-registered groups to increase their knowledge, understanding and confidence to participate in the democratic system. This will include funded partnerships, alongside smaller informal pieces of work supporting our registration campaign, and our voter engagement work more broadly.

Finally, we have also launched a new Democratic Education Forum in partnership with Welsh Government to build knowledge, share best practice and gain feedback from teachers across Wales.

### **Electoral reform**

We will continue to support the Welsh Government's electoral reform agenda, providing expert advice and constructive challenge to ensure that the changes being introduced for the next set of devolved elections can be successfully delivered for voters, electoral administrators and campaigners.

With the Senedd Cymru (Members and Elections) Act 2024 and the Elections and Elected Bodies (Wales) Act 2024 now passed by the Senedd, our focus will turn to the implementation of these changes ahead of the 2026 election. We 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.

We will continue to engage with the Senedd and the Welsh Government on those pieces of primary legislation that are still being developed. We will also work with the Welsh Government and participating local authorities on the development of automatic registration pilots and will publish a formal evaluation of these pilots as part of our statutory responsibilities under the Elections and Elected Bodies (Wales) Act 2024.

Our work in this area is supported by the significant evidence base we develop through our programme of work on electoral modernisation, including the research we continue to conduct with the public and electoral administrators. Our ongoing research programme ensures our advice is based on an up-to-date understanding of public attitudes, to underpin the development of policy proposals for further modernisation.

## **Supporting the delivery of well-run elections and electoral registration**

We will provide support to Returning Officers (ROs), Electoral Registration Officers (EROs) and their teams in all Welsh local authorities through a programme of regular engagement including providing advice and guidance and responding to any queries and issues. We will monitor performance against our published performance standards, and we will also undertake a review of standards to ensure they are relevant in Wales, particularly regarding the Welsh language.

In November, we will publish our full report on the 2024 UK Parliamentary general election and the May polls in Wales and England. This will draw on our full suite of evidence and data – including from voters, candidates and campaigners, and electoral administrators – and make specific recommendations for wider improvements to elections. This will include working with local authorities, the media and civil society organisations to increase awareness of the new accessibility measures at the polling station; ensuring that candidates can campaign and debate with each other in an environment free from abuse and intimidation; and working with the UK's governments and wider electoral community to ensure that administrators have sufficient time, capacity and resources to continue to deliver well-run elections. We will continue to work with the Welsh Government to draw on, and reflect, any wider lessons learned from the 2024 polls well in advance of the May 2026 Senedd elections.

We look forward to assisting and supporting the new statutory Electoral Management Board for Wales and will use this new forum to help ROs and EROs to deliver a consistent and high-quality service for voters and those standing for election. We also will continue to work closely with electoral administrators throughout Wales to ensure their views and needs are fully reflected in our work.

## **Engaging regulatory and wider stakeholders**

The Commission will continue to use the Senedd Parties Panel to engage with political parties and understand how we can best support them and their candidates to deal with the challenges they face. We will also continue to engage with smaller parties in Wales and independent candidates to help them comply with the rules. This will include advice and guidance tailored to Welsh needs, publication of details of donations, loans and annual party accounts, and monitoring and enforcement of compliance with political finance law.

In addition, we will deliver training sessions ahead of the Senedd election in 2026 for parties, candidates and non-party campaigners to ensure compliance with the new rules. This training will be carried out at party conferences, face-to-face briefings, and

via digital platforms. We will also support local authorities by attending their candidate and agent briefing sessions and deliver training for candidates and agents at those briefings.

For the 2026 election we will develop a Code of Practice for Non-Party Campaigners on spending at the Senedd election, and Party and Candidate Spending Codes in line with the new legislation. These Codes of Practice will be laid in the Senedd.

We will continue to inform Members of Senedd about our work, including through briefings, drop-in sessions and one-to-one meetings. We will also press ahead with plans to establish a Cross-Party Group on Democracy, to provide a forum for Members of the Senedd and key stakeholders to discuss issues relating to democracy and elections in Wales.

## Draft UK Corporate Plan 2025

Our draft UK Corporate Plan 2025-2030 sets out five strategic objectives that will have an impact on elections delivered in Wales.

In fulfilling all our statutory functions, the Commission seeks to ensure that our democratic system works for all parts of the UK, responding to initiatives taking place in both devolved and reserved elections and for all those who participate whether as voters, candidates, campaigners or administrators. We seek to consult on our proposals with the UK, Welsh and Scottish governments, and electoral stakeholder groups such as the EMBs in Scotland and Wales and the Northern Ireland Electoral Office. More widely we will seek views on our proposals as we finalise our plan from a wide range of our stakeholders including political parties, electoral administrators, representatives of civil society and other interested parties. The timing of the UK Parliament General Election has meant that we have not had an opportunity to discuss the activities in the draft UK Corporate Plan before submission of the estimate but can now do so.

Given the different statutory deadlines in place for submitting budgets to the three funding Parliaments, and the challenges posed as a result of this, we feel that we must provide you with some of the proposed costs for activities that will be undertaken in the next financial year, and we believe will be of benefit to voters in Wales ahead of the 2026 polls and of formal publication of the plan in early 2025.

The 2025-26 estimate for costs attributable to the Senedd for relevant Corporate Plan activity is £210,749.

## **Objective 1: Supporting Welsh Voters**

The evidence shows voters in Wales need better information (preferably online) on how to register and vote. For voters with access needs, registering and casting their vote often remains challenging.

We have strong evidence that our existing voter engagement work is having a positive impact – for example, 512,000 young people across the UK took part in our Welcome to Your Vote week initiatives in February 2024, with 71% of educators saying that young people’s knowledge of democracy increased, and 57% saying the likelihood of their young people registering to vote increased. We will upscale our education and partnership work and expand our strategic support to existing teams in Wales with a particular focus on working with teachers and charity groups. This will be done by working collaboratively with all partners in Wales, including the Senedd, the Electoral Management Board for Wales and the Welsh Government. We will co-create materials that respond directly to partners needs and support voters to develop political and media literacy skills, reducing the impact of mis- and dis-information. We will be ready to respond to the Welsh Government’s developing legislative agenda and continue to provide all voters in Wales with accessible postcode specific information and will harness digital tools to make our published data more transparent.

As part of this work, we will continue to fund the Democracy Club to provide our election information and polling station look-up for the May 2026 polls – this is a vital tool for voters which also relieves pressures on Welsh electoral services teams. Democracy Club have indicated that they will stop providing this service, so working in partnership, and capitalising on the accessibility pilots funded by the Welsh Government, the Commission will develop our own look-up tool which we expect to be operational ahead of the May 2027 polls.

## **Objective 2: Modernising the electoral system**

The electoral system and the legal framework that underpins it has evolved in a piecemeal way. The resulting complex system presents significant challenges for electoral services teams under pressure to deliver more for less. These administrative challenges also mean that some voters experience issues trying to cast their votes – for example newly enfranchised voters in Wales.

We advocate for consolidation and simplification as part of a programme of law reform. We remain committed to working with the newly established Electoral Management Board in Wales to relieve pressure on electoral services teams but our experience delivering our current programme of work clearly demonstrates that we need to do more

to meet the needs of electoral services teams and campaigners. We will increase the support we provide to electoral administrators, modernise our approach to providing guidance, and work with key suppliers to achieve greater efficiencies and systemic improvements. Ultimately these initiatives will seek to build greater resilience and a more robust electoral system.

### **Objective 3: Protecting the system / tackling threats**

The threats to our democracy are growing and changing. Voters are increasingly exposed to mis- and dis-information and dubious campaign practices continue to undermine trust. This ranks as the public's second largest concern around elections, behind bias in the media. Campaigners and candidates reported record levels of online, physical and gendered intimidation at the recent UK Parliament general election and foreign interference in the form of cyber-attacks is causing disruption to elections.

We intend to step up work monitoring and mitigating threats to our democracy. We will continue to monitor and advise on these risks every day, working in collaboration with all relevant partners in Wales including the four police forces. As these threats increase, and ahead of the 2026 Senedd election we need to strengthen our response. We will use data and technology more effectively to identify and remove digital content aimed at undermining our democracy; crack down on campaigning techniques designed to deceive voters; provide more support to candidates, and with the police will tackle abuse and intimidation head on. We will continue to strengthen our protections against existing and emerging cyber threats; tighten controls on political donations, and close loopholes on foreign company finance and donations from unincorporated association.

### **Objective 4: The resilience of the democratic system**

In our regulatory role we monitor the health of our democracy and make evidence-based recommendations aimed at strengthening the electoral system. Our [Annual Public Attitudes Tracker](#) survey shows that the trust in the Electoral Commission remains high. We aim to scale up slightly our proactive policy work and international analysis. Evidence will remain at the heart of all recommendations we make. We will be able to do more to bring key players together to agree and implement impactful initiatives that improve our electoral system. We will conduct deliberative research to inform this work in Wales, based on the needs of the Senedd and Welsh Government so that we truly understand and address the needs of communities in Wales.

## **Objective 5: Strengthening the Electoral Commission**

As our electoral system evolves, we need to adapt to meet the changing needs and expectations of voters, the Welsh Government, campaigners and electoral services teams. Our current systems and support services need investment, not only to deliver our current work, but also to deliver this ambitious and vitally important programme of work with good value for money.

We will invest in our systems taking note of previous concerns expressed by the Committee around our financial processes, ensuring that they all work together and represent value for money. We will develop greater digital expertise and will explore the potential to harness new technologies such as artificial intelligence and machine learning to achieve greater efficiencies and improvements for users. We will ensure all our staff receive the training and support they need to deliver and will pay them competitively for their important work.

Following last year's cyber-attack, we have invested in strengthening the Commission's systems. The benefits of some of this work is already evident. An independent cyber penetration test of our external facing IT systems reported zero vulnerabilities on our systems. These tests are carried out quarterly and we have seen a significant tightening of the security on our systems, using the latest techniques and solutions to protect our services.

Thanks to the funding provided by you and the other Parliaments over the last twelve months we have been able to deliver several projects. These include - firewall upgrades, with full logging and monitoring tools; the latest multi-factor authentication service from Microsoft; fully automated patch management; replacement of all end-of-life servers; replacement of all mobile devices with the current models; joining the NCSC's early warning service; introducing full email scanning through Mimecast to reduce phishing, spoofing and malware intrusions. In the next twelve months we will be moving to Windows 11, upgrading our CRM and delivering new services around disaster recovery.

We also work closely with expert third-party vendors to deliver cyber security monitoring on a 24-hour basis, protecting our systems and tracking suspicious activity. These services are linked to global cyber knowledge and update daily to provide us with another level of security.

The threats against the Commission and the democratic system continue to evolve. Our proposals in the Corporate Plan are designed to address these ever-growing threats and mitigate against the ever-present threat of another cyber penetration. And we will step up our work with political parties to support their cyber security.

### **Next steps**

We will begin to consult on the detail of this draft Corporate Plan in November 2024 ahead of laying a final version in March 2025. This consultation process will include all key partner groups, and particularly the Senedd. While the figures included for core and event costs are set, it is likely that the apportionment for relevant Corporate Planning activity may change based on its development, with the likely impact being decreasing the final amount required. We will keep the Committee updated as to this area of work.

### **Value for money**

The Commission's ability to demonstrate value for money hinges on our ability to optimise procurement practices, manage contracts efficiently, manage risks, monitor and improve performance, and make informed decisions about resource allocation through effective prioritisation, while ensuring financial and IT controls are in place and working effectively. We will seek to ensure that we are not only fulfilling our objectives, but also doing so in a cost-effective and efficient manner, ultimately driving gains in public value.

Following lessons learnt from previous finance cycles, the budget models have been rebuilt and semi-automated to reduce risks of errors. This has allowed for additional time for further scrutiny of the numbers and numerous rounds of internal challenge to ensure costs are robust and delivering value for money, allowing us to identify savings where we can within the Commission, including sub-leasing part of the Commission's London Office at Bunhill Row to the Local Government Boundary Commission for England at £105,000per annum, which reduces the Senedd's share of the costs.

Despite continued high inflationary pressure impacting Commission pay and non-pay costs for the past three years, we will continue to seek to mitigate inflation wherever possible. Cost as an average per member of population in Wales, within Core, has decreased from 46p to 42p, (compared with cost per member of UK population within Core and Event which have decreased from 73p to 68p) highlighting the continued drive for cost mitigation.

We are committed to ensuring efficient and effective use of funding. To achieve this, we focus on several key areas of work, including procurement, contract management, performance management, and effective prioritisation. We have put in place a new procurement team so that we can ensure better value for money with our partners and suppliers. We have also strengthened our finance support to ensure that

we are able to produce robust and accurate budgets and forecasts. These investments are necessary to ensure that every public pound is used wisely.

### **Measuring performance**

Throughout our Corporate Plan we identify improvements we will deliver to benefit the public, parties and campaigners, electoral administrators and parliaments. We aim to measure the impact of these improvements using a range of performance indicators. We will use a mix of quantitative and qualitative measures, to drive continuous improvements in our procedures and skills. By default, performance and system data will be collected at the level of the four parts of the UK: Wales, England, Scotland and Northern Ireland – in support of the accountability for our work.

Our corporate performance indicators sit alongside a group of indicators which show the health of the electoral systems. These are called system indicators and measure the health of the electoral system as a whole and are not indicative of how we are performing as an organisation. They help guide actions by us and others (including elected members, government, campaigners and parties, electoral administrators and the Police).

We are making good progress against the performance indicators 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). 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. We were also unable to meet our target dates for implementing all of the internal audit recommendations agreed by the Audit and Risk Assurance Committee, due to staff capacity and availability. These recommendations were completed by their revised due date.

As part of the new wider UK Parliamentary Corporate Plan work, we are looking to revisit our performance indicators taking into account any shifts in priority or policy. A series of discussions and workshops to identify these measures will take place within all areas of the Commission.

We commend the enclosed estimate for the financial year 2025/26 to the Committee and look forward to discussing it with you when appropriate. Please contact Rhydian

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Commission

Thomas, Head of the Electoral Commission, Wales if you wish to discuss any of the above in the first instance.



**Professor Dame Elan Closs Stephens CBE**  
**Electoral Commissioner, Wales**



**Vijay Rangarajan**  
**Chief Executive and**  
**Accounting Officer**