

Scrutiny of the Electoral Commission's financial estimate for 2026-27

November 2025



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Scrutiny of the Electoral Commission's financial estimate for 2026-27

November 2025



About the Committee

The Committee was established on 14 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



Llyr Gruffydd MS
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Peredur Owen Griffiths MS
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Joyce Watson MS
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The following Members attended as substitutes during this inquiry.



Hannah Blythyn MS
Welsh Labour



Heledd Fychan MS
Plaid Cymru

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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 2026-27 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 23

Recommendation 1. The Electoral Commission should update the Committee as soon as possible regarding whether a Supplementary Estimate will or will not be required in relation to costs incurred for automatic voter registration.....Page 23

Recommendation 2. The Electoral Commission should keep the Committee updated on the impact of its paid advertising campaign on both under-registered groups and the wider electorate.....Page 23

Recommendation 3. The Committee would welcome updates on the newly implemented performance-related pay regime, including whether it is having the intended effect, in future Estimates.....Page 24

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 2026-27

6. The Commission submitted its financial Estimate for 2026-27⁶ to the Committee on 29 September 2025, along with a covering letter.⁷

7. The Committee met on 6 November 2025 to scrutinise the Estimate. 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)
- Chris Pleass (Director of Corporate Services, 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

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 2026-27

⁷ Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission

plans. The Committee shared the Commission's Estimate for 2026-27 with the Welsh Government on 30 September 2025. The advice of the Cabinet Secretary for Housing and Local Government (the Cabinet Secretary) was received on 16 October 2025.⁸

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 2026-27. 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, 16 October 2025.

⁹ Statement of Principles between the Senedd's Finance Committee and Directly Funded Bodies

2. The Electoral Commission Annual Report and Accounts 2024-25

10. The Commission laid its Annual Report and Accounts for 2024-25 before the Senedd on 21 July 2025.¹⁰ This included a Wales (devolved) annual report for 2024-25¹¹, 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 2024-25 the Commission utilised 99.2 per cent of its resources from the £1.6 million available. The report states that "this was predominantly staffing (60 per cent), and the remaining amounts represent the Senedd contribution to common activities and corporate overheads."¹² This is the same split as 2023-24.

12. The Commission noted its current and future activities in Wales:

- Continuing to support the police in developing a suite of communication that police forces across Wales can use ahead of future elections to attempt to deter people from acting in an abusive manner toward those taking part in elections. This work is ongoing and will continue ahead of the Senedd elections in 2026;
- Assisting and supporting the Electoral Management Board for Wales and will use this new statutory forum to help Returning Officers and Electoral Registration Officers to deliver a consistent and high-quality service for voters and those standing for election;
- Working with the Welsh Government and participating local authorities in preparation for a series of automatic registration pilots, which will be taking place in four areas across Wales. In September, the Commission began an evaluation of the effectiveness of the pilots before publishing its report in January 2026; and
- Working with Welsh Government officials to ensure legislative changes to the election rules for the 2026 Senedd elections are reflected in

¹⁰ [The Electoral Commission Annual Report and Accounts 2024-25](#)

¹¹ [The Electoral Commission Annual Report and Accounts 2024-25. Wales Annual Report](#)

¹² [The Electoral Commission Annual Report and Accounts 2024-25. Wales Annual Report](#)

guidance to both electoral administrators and regulated communities, which the Commission will publish and promote in the autumn of 2025.

13. The Commission also outlined the introduction of a new partnership grant scheme, which it said would “provide funding for projects that aim to increase knowledge and understanding of the democratic system amongst under-registered groups”.¹³

14. During the Committee’s scrutiny session on the Commission’s 2025-26 Estimate, the Commission noted 70 per cent of its advertising budget would target under-registered groups in 2025-26. The Commission explained:

“So, the weighting is 70 per cent towards under-registered groups versus 30 per cent to a mass audience, and that means we’re reducing wastage from people who are already registered and don’t need to see the campaign. So, we’re already thinking really carefully about value for money, about the types of channels that we use, and who the campaign is targeted at, as I say, so that we’re ensuring best value for money.”¹⁴

15. In its report on the Commission’s 2025-26 Estimate, the Committee recommended that the Commission provide updates on its engagement work with under-registered groups and how it intends to measure the impact the paid-for advertising campaign is having, both on those groups and the wider electorate.¹⁵

16. During scrutiny of the 2026-27 Estimate, the Commission outlined their channels of communication, including those which they know young people use, such as TikTok and Snapchat. The Director of Communications also explained that they would be doing mass advertising via billboards and television as usual, whilst also trialling new approaches:

“We are going to be advertising via Tesco and Co-op in-store. We’re also looking at advertising through Gumtree, trying to

¹³ [The Electoral Commission Annual Report and Accounts 2024-25. Wales Annual Report](#)

¹⁴ [RoP 4 November 2024, para 42](#)

¹⁵ [Report of the Llywydd’s Committee: Scrutiny of the Electoral Commission’s financial Estimate for 2025-26](#)

*reach home-movers, who we know tend to be under-registered.*¹⁶

17. The Chief Executive also outlined the Commission's use of partner organisations to reach those under-represented groups that are not reachable through mass media or some social media channels.

18. The Committee questioned the Commission on how the paid-for advertising is evaluated. The Director of Communications explained that the evaluation is "split into three sets of metrics... campaign... awareness... and... voter behaviour."¹⁷ The Chief Executive highlighted that the board regularly debates the balance between traditional forms of communication and new channels, in terms of value for money, and also that automatic voter registration is likely to cause "a significant rethink of how we actually do our campaigning"¹⁸ as they will no longer need to run registration campaigns.

19. The Committee asked the Commission whether the focus on impressions was appropriate, and whether they could tell if these led to someone registering to vote or voting, particularly in relation to under-represented groups and young people. The Commissioner stated:

*"...the question for all of us, and for the board in particular is: at what point do you reach a cusp where you think that a booklet has gone past its sell-by and that the heritage media, as I might call it, is no longer what's required and whether we are now entering a digital-only phase, where everybody over—? I think that there will come a time when people who are older than me will be digitised and that the booklet may no longer be necessary, but we haven't reached there yet. It is something that we keep in mind."*¹⁹

20. The Committee questioned whether the lack of detailed information was appropriate in schools, and asked the Commission how it was working with educators to ensure that young people have information from a trusted source. The Head of the Electoral Commission in Wales explained that the Commission has been

¹⁶ [RoP para 88](#)

¹⁷ [RoP para 123](#)

¹⁸ [RoP para 127](#)

¹⁹ [RoP para 134](#)

“...providing and publishing education resource and education material since before the 2021 elections, both for educators and for young people themselves, and we've very recently created a new suite of education resources, working alongside the Senedd Commission and the children's commissioner.”²⁰

21. He also highlighted the importance of political and citizenship education, and the work that they intend to do following the 2026 election to “convene leaders in the education sphere in Wales to talk to them about the future of citizenship education”²¹. He went on to express the Commission's concerns that there is insufficient time for teachers to talk about these things, as well as a lack of confidence in discussing them in the current political climate.

The Electoral Commission's Corporate Plan for Wales

22. In October 2021, the Commission submitted its Corporate Plan for Wales 2022/23 – 2026/27 (the ‘Plan’)²² 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.

23. The Commission will draft, consult on and lay a new Welsh Corporate Plan following the 2026 Senedd elections.

24. In her letter to the Committee, the Cabinet Secretary highlighted the difference between the Commission's 2026-27 Estimate and its budgetary estimates present in its Welsh and UK plans, saying:

“I also note the disparity between the estimate presented to the Committee [£3.6m]: the projection in the Electoral Commission's five-year plan for Wales of £1.79m, and the

²⁰ [RoP, para 136](#)

²¹ [RoP, para 137](#)

²² [The Electoral Commission's Corporate Plan for Wales](#)

*projected figure of £3.9m set out in the UK Corporate Plan 2025-30....*²³

25. When asked about this, The Director of Corporate Services stated that the number was produced around five years ago, and that “the scope and direction of the Commission’s work has changed significantly”²⁴ since then. He also stated that the Commission’s UK corporate plan is “ambitious and transformational” and the Head of the Electoral Commission in Wales said that the Commission “would want the Welsh corporate plan to be similarly ambitious.”²⁵.

Automatic voter registration

26. The Electoral Commission have been working with the Welsh Government to trial automatic voter registration (AVR) in four pilot areas over the past year. The Head of the Electoral Commission in Wales explained:

*“The statutory deadline for the publication of the report is the end of December. We’ll be publishing well ahead of that. Then it will be for the Welsh Government to decide what to do in the future in terms of AVR—whether this Welsh Government or a future Welsh Government—and whether they decide to roll it out in its entirety, whether they decide to use one of the models included within the pilots, thinking about specific audiences and how they’re included and not included.”*²⁶

27. In their covering letter, the Commission highlighted the possibility of submitting a Supplementary Estimate regarding the automatic voter registration for the May 2027 local government elections in Wales, saying:

“As the implementation of automatic voter registration (AVR) in Wales for the May 2027 local elections is not yet confirmed, nor the form it will take, we have not included figures in this estimate to cover any potential associated costs. When this policy has been clarified by Welsh Government, and in particular how it will interact with any UK-wide AVR system

²³ [Letter from the Cabinet Secretary for Housing and Local Government, 16 October 2025.](#)

²⁴ [RoP para 205](#)

²⁵ [RoP para 206](#)

²⁶ [RoP para 36](#)

*later, we should be able to assess the impact and will return to the Committee with a supplementary bid if required.*²⁷

28. The Chief Executive explained that the Westminster Government is currently working on its own version of AVR, and that there are many questions around how the two systems would interface:

*"I think that a lot of this is still to be worked out in the course of the next couple of years. It does have an enormous benefit at the end of it for voters, I think, and for administrators and for political parties, but we can't yet see exactly what system is going to be implemented when and hence estimate what the costs are going to be.*²⁸

²⁷ Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission

²⁸ RoP para 40

3. Scrutiny of the Electoral Commission's financial Estimate for 2026-27

Overview

29. The total of the Estimate submitted by the Commission for the financial year 2026-27 was £3.609 million. This is an increase of £867 thousand in cash terms and equates to a 32 per cent increase compared with the Estimate for 2025-26. The Estimate is at Annex A. The Commission explains the funding increase in its covering letter to the Estimate, stating:

"Our work programme in the financial year 2026-27 covers two electoral events in Wales - the Senedd election in May 2026 and the Local Government elections in 2027. These events mean that the budget estimate for 2026-27 represents a peak, but the figures will reduce again in the following years when there are no elections."²⁹

30. In its report on the scrutiny of the 2025-26 Estimate³⁰, the Committee recommended the Commission separate both core and event costs and this has been done in the 2026-27 Estimate.

31. The Commission's covering letter to the Estimate notes £1.443 million has been allocated for total core costs to the Senedd, which is a 9.7 per cent increase compared to 2025-26, which the Commission notes is driven by the increased number of staff working on UK-wide issues as set out in its UK Corporate Plan, such as mis and disinformation, voter information, and candidate abuse and intimidation.

32. The 2026-27 estimate for event costs attributable to the Senedd is £1.860 million, a 53 per cent increase compared to 2025-26. The Commission's letter says:

²⁹ [Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission](#)

³⁰ [Report of the Llywydd's Committee: Scrutiny of the Electoral Commission's financial Estimate for 2025-26](#)

*"The focus of the Commission's work in Wales is to effectively support the delivery of the Senedd election in 2026 and the Local Government elections in 2027."*³¹

33. The Committee asked the Commission to justify the overall increase of 32 per cent, and to confirm that future Estimates would seek less funding. The Director of Corporate Services outlined that three-quarters of the increase related to election events, and the core cost increase were organisational growth and increased investment in IT. He also explained that:

*"...2026-27 is very much a peak year, with significant increases, as you've highlighted, before reverting to around this year's cost level the year after, 2027-28, and then from 2028-29 to more of a steady state figure of about just under £2 million per annum plus inflation."*³²

Communication

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

*"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."*³³

35. In 2025-26, the Cabinet Secretary for Housing and Local Government's letter³⁴ to the Committee 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.

³¹ Covering letter from the Electoral Commissioner Wales and the Chief Executive and Accounting Officer, Electoral Commission

³² RoP para 77

³³ Report of the Llywydd's Committee: Scrutiny of the Electoral Commissioner's financial estimate for 2024-25

³⁴ Letter from the Cabinet Secretary for Housing and Local Government, 17 October 2024

36. Consequently, the Committee made a recommendation in its report on the scrutiny of the Commission's Estimate for 2025-26³⁵ for the Commission to communicate regularly with the Committee throughout the year.

37. The Chair of the Llywydd's Committee met with the Commission on 2 July 2025 and 20 October 2025. It provided an update on the work it had undertaken to implement the recommendations in the Committee's report on the Commission's 2025-26 Estimate and work it is currently doing on disinformation and candidate abuse.

38. In relation to the Commission's communication during the past year, the Head of the Electoral Commission in Wales stated:

"I think the process has certainly improved. We've got an engagement plan, a communications engagement plan, which we've drafted alongside yourselves. We have planned meetings two or three times a year. You were very welcome in coming to our office earlier this year, and there are written briefings that we provide to you."³⁶

39. He suggested that there was some work to do still in terms of Members more generally, and that following the meeting the Committee would be provided with an "engagement plan for the next calendar year."³⁷.

Budgetary cycles

40. During the Committee's scrutiny of the 2025-26 Estimate, the Commission highlighted the challenges of presenting reliable figures in its Estimate by the statutory deadline of 30 September. The Commissioner said there:

"...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

³⁵ Report of the Llywydd's Committee: Scrutiny of the Electoral Commission's financial Estimate for 2025-26

³⁶ RoP para 20

³⁷ RoP para 21

insurance et cetera this time round, which we couldn't have anticipated."³⁸

41. She explained:

*"Why I'm putting this honestly on the table to you is that this is not a matter of suspicion; it's a matter of mutual understanding of how we achieve these figures and what our best estimate will be of figures that we are putting in six months in advance of those figures being solidified, and six months in front of things like procurement having happened and exactly how much things are going to cost, like a brochure, for example. So, we are doing our best and being as reasonable as possible..."*³⁹

42. Consequently the Committee recommended in its report:

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.*

43. In June 2025, the Commission provided a written update regarding its activities in 2025-26, which stated:

"The Chief Executive wrote to the Chair of the Finance Committee on 28 March regarding the timing of the budget submission process. We note that the Committee referenced the letter at their meeting on the 30 April, which we understand will inform work relating to updating the Senedd's budgetary procedures in the coming months."

44. The Committee noted a letter from the Chair of the Finance Committee at its meeting. This outlines the Welsh Government's response to Directly Funded Bodies' views on proposed changes to the Budget Process Protocol and

³⁸ RoP, para 12

³⁹ RoP, paragraph 13

supplementary budget procedures. The Cabinet Secretary indicated that no changes would be made during this Senedd.⁴⁰

Senedd Cymru legislation costs

45. The Senedd Cymru (Member Accountability and Elections) Bill (the 'Bill')⁴¹ aims to give people in Wales the power to remove Members of the Senedd who seriously break conduct rules. It sets out a recall mechanism for the Senedd with two clear triggers that would lead to a Member becoming subject to a recall poll:

- Where a Member is convicted and sentenced to imprisonment (including suspended sentences); and
- Where the Senedd agrees a recommendation from the Standards of Conduct Committee that a Member should be subject to a recall poll as a result of serious misconduct.

46. In her letter, the Cabinet Secretary for Housing and Local Government notes she is not aware of significant costs attributed to the Electoral Commission through the Bill and assumes "this work has not contributed to the estimate". The Cabinet Secretary states:

*"The Committee may wish to satisfy itself on that point and note the Bill's timetable is set out incorrectly in the table. Introduction and passage are planned for the sixth Senedd (financial year 2025-26), with implementation in 2026-27, should the Senedd agree the Bill."*⁴²

47. The Committee questioned the Commission on whether they thought that there would be any significant costs incurred by the Bill. The Head of the Electoral Commission in Wales confirmed that he did not "foresee there being any significant add-on costs"⁴³. The Chief Executive added:

*"Were it to happen, we would then be into advising on how to actually implement such a system. So, I think it's one of the issues we will absorb, unless it actually needs a large public campaign, but that's unlikely..."*⁴⁴

⁴⁰ [Letter from the Chair of the Finance Committee, 24 October 2025](#)

⁴¹ [Senedd Cymru \(Member Accountability and Elections\) Bill](#)

⁴² [Letter from the Cabinet Secretary for Housing and Local Government, 16 October 2025](#).

⁴³ [RoP, para 63](#)

⁴⁴ [RoP, para 66](#)

Welsh budget

48. If a Budget resolution for a financial year is not passed by the Senedd before the start of that financial year (1 April) then initially only 75 per cent of the budget authorised to be used in the previous financial year is available. This figure increases to 95 per cent if a Budget resolution has not been agreed by the end of July.

49. However, an Annual Budget Motion can be tabled and considered by the Senedd during the financial year to which it relates. So theoretically, the budget for 2026-27 could be passed after 1 April 2026 if the Senedd has not agreed a budget by that point.

50. The budgets of directly funded bodies, such as the Electoral Commission, Wales Audit Office, Public Services Ombudsman for Wales and the Senedd Commission, are also included within the annual budget motion.

51. In the event that a budget was not agreed, these directly funded bodies would only be able to access 75 per cent / 95 per cent of their budget until an annual budget motion was authorised.

52. When asked about this, the Commission confirmed that they had considered what would happen in these circumstances, and that they would find a way to continue core costs. The costs associated with events would be more challenging, and the campaign would have to be run in fewer places, which would have the biggest effect on under-registered voters.

53. The Committee asked about whether those costs would be in the 2025-26 budget or the previous year's, and the Director of Communications confirmed that the majority of advertisements for registration are run in the last three weeks before the registration deadline:

"There is a large amount that is covered under this year's budget, but actually, the majority of the advertising actually happens in those final three weeks before the registration deadline. We know that people are very motivated by a deadline, and that's when we tend to see the spike in registration."⁴⁵

⁴⁵ RoP, para 54

Disinformation and candidate abuse

54. The Committee highlighted issues with misinformation during the Caerphilly by-election and the Commission outlined its work on this, including discussions with police forces around what could be done around misinformation, disinformation and candidate abuse:

"The first element is a general one, ensuring that the police forces are able to support the management and administration of the elections—polling stations, counts and so on—and to be aware that it is a significant event that may need additional resource this time around...the second element—and more to your point, perhaps—is that we will want to produce, alongside the police forces in Wales, the College of Policing and ourselves, and potentially the management board, some additional guidance and resources—for candidates, to explain to them what the situation and the process is, and also slightly wider, to the public at large."⁴⁶

55. The Chief Executive outlined work being done by the Commission on a UK-wide level, including updating the Welsh election information platform, working with social media platforms, discussions with Ofcom, and other work surrounding the detection of deepfakes:

"...we're looking at whether we can actually start to try to detect these things in real time during the May elections. It's not easy. Again, this is going to be, probably, a pilot we will try to run."⁴⁷

56. This work has driven an increase of 9.7 per cent in core costs, and there has been an increase of 9 per cent in resource allocation, due to additional IT roles, investment in IT and cyber security, and addressing gaps in capacity and capability in departments such as Finance, Procurement and Human Resources. The Chief Executive confirmed that since the cyber-attacks in 2021-22, the Commission has:

"...vastly improved our cyber security and essentially shut down all our legacy servers, moved everything into the cloud, put up multiple different walls of security."⁴⁸

⁴⁶ RoP, paras 69-70

⁴⁷ RoP, para 73

⁴⁸ RoP, para 154

57. The Commission has been attacked frequently and continues to update its IT infrastructure accordingly. The Chief Executive also outlined its work with political parties on their cyber defence, as well as the aim to put more information online for voters, including building on the Democracy Club's polling station finder.⁴⁹

58. The Director of Corporate Services explained that addressing gaps in capacity has been his focus since he joined the Commission, and that the National Audit Office had carried out an independent review of this, which had been extremely positive. He also highlighted that the Commission's "forecasting performance is improving, and that is both marked and measurable."⁵⁰

59. The Commission has included a budget of £60 thousand for the 2026-27 pay award, based on 3.6 per cent inflation and a provision of 1.75 per cent associated with the pay review implementation. The Welsh Government has budgeted for a 2.2 per cent uplift for public sector pay elements. The Director of Corporate Services explained that the basis for the inflation figure was the ONS forecast, and that:

*"The 1.75 per cent is an assumption as we move into the first year of operating pay progression and performance-related pay. I think we've spoken to this committee about that. We've had long-standing issues with our pay regime in the organisation and carried out a complete overhaul to a much simpler system that allows for progression through a smaller number of gradings."*⁵¹

60. When questioned as to whether the use of the CPI measure for inflation was appropriate, the Commission explained that this is what has been agreed with the Speaker's Committee in Westminster. The Committee noted that this is a different measure than that used by the rest of the Directly Funded Bodies.

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 both in preparation for the Senedd 2026 election and the local elections in 2027. We understand that this financial year is effectively bookended by elections and that this has caused a spike in costs. However, in line with what the Commission has

⁴⁹ [RoP para 156](#)

⁵⁰ [RoP para 160](#)

⁵¹ [RoP para 184](#)

outlined in its evidence, we will expect costs to decrease in 2027-28 and again in 2028-29.

62. The Committee is pleased that the recommendations put to the Commission following last year's scrutiny of its accounts have been taken on board, and believe that this has provided a more transparent Estimate for the 2026-27 funding request. The separation of core business costs and direct event costs has made it much clearer.

63. The Committee is sympathetic to the complexities of the current situation around automatic voter registration, and the challenges posed by the potential of having two systems running alongside one another and interfacing in different ways. However, due to the proximity of the Senedd election, we would appreciate early information on the need for a supplementary budget or lack thereof.

64. The Committee is grateful for the Commission's ongoing communication throughout the past year. We would be particularly keen to be kept up to date on the impact of the paid advertising campaign on under-registered groups and the electorate at large.

65. Whilst the Committee appreciates that the Commission has re-evaluated its pay scales and that this will eventually be "self funding"⁵², we are concerned about the different inflation forecast used by the Commission for its pay award compared to other DFBs. However, the Committee acknowledges this is what has been agreed with the Speaker's Committee in Westminster.

Conclusion 1. Subject to the conclusions and recommendations to this report, the Committee is content that the financial Estimate for 2026-27 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 Electoral Commission should update the Committee as soon as possible regarding whether a Supplementary Estimate will or will not be required in relation to costs incurred for automatic voter registration.

Recommendation 2. The Electoral Commission should keep the Committee updated on the impact of its paid advertising campaign on both under-registered groups and the wider electorate.

⁵² RoP, para 184

Recommendation 3. The Committee would welcome updates on the newly implemented performance-related pay regime, including whether it is having the intended effect, in future Estimates.

Annex 1: The Financial Estimate for 2026-27

Wales Electoral Commission Annual Estimate Table 2026-27

		2024-25 Actual outturn £000s	2025-26 Budget £000s	2026-27 Estimate £000s	2026-27 Estimate Core £000s	2026-27 Estimate Event £000s	Variance (25/26 vs 26/27) £000s	Variance (25/26 ch 26/27) %
Direct Costs (pay and non-pay)								
Devolution governance and law	Legislation strategy and coordination	21.9	10.7	6.1	6.1	0.0	-4.6	-43%
		Commentary <p>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 government's 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. The costs have reduced for 26/27 given that the majority of the legislation was passed in 25/26 and we do not expect to coordinate this work to the same level in 26/27.</p>						
	Wales	270.3	39.5	48.0	42.0	6.0	8.5	22%
		Commentary <p>This represents the Committee's share of the costs associated with supporting the implementation of further legislative reforms, including the introduction of a Bill to strengthen member accountability in the Senedd and updates to the local election rules ahead of the May 2027 elections; supporting ROs/EROs, administrators through</p>						

	2024-25 Actual outturn £000s	2025-26 Budget £000s	2026-27 Estimate £000s	2026-27 Estimate Core £000s	2026-27 Estimate Event £000s	Variance (25/26 vs 26/27) £000s	Variance (25/26 ch 26/27) %
Legal	72.7	54.7	59.5	59.5	0.0	4.8	9%

Commentary

This represents the Committee's share of the total cost of providing legal support to the Commission's advice, guidance and regulation functions; 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); advising on proposals for electoral reform in Wales and ensuring that the Commission fulfils its accountability obligations to the Senedd.

		2024-25 Actual outturn £000s	2025-26 Budget £000s	2026-27 Estimate £000s	2026-27 Estimate Core £000s	2026-27 Estimate Event £000s	Variance (25/26 vs 26/27) £000s	Variance (25/26 ch 26/27) %
		29.1	19.6	19.2	19.2	0.0	-0.4	-2%
Governance		<p>Commentary</p> <p>This represents the Committee's share of the total costs of providing corporate governance services across the Commission. This includes 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).</p>						
Sub-total		394.1	124.5	132.8	126.8	6.0	8.3	7%
Electoral administration and regulation	Support and improvement	17.6	15.6	13.5	13.5	0.0	-2.1	-13%
		<p>Commentary</p> <p>This represents the Committee's share of the total costs associated with the monitoring and support of EROs and ROs in the delivery of their statutory electoral services. It also includes managing the assessment of RO and ERO performance against the Performance standards throughout the delivery of the major electoral events in 2026, and the preparation for the May 2027 elections.</p>						
	Guidance	44.6	42.5	42.2	36.4	5.8	-0.3	-1%
		<p>Commentary</p>						

		2024-25 Actual outturn £000s	2025-26 Budget £000s	2026-27 Estimate £000s	2026-27 Estimate Core £000s	2026-27 Estimate Event £000s	Variance (25/26 vs 26/27) £000s	Variance (25/26 ch 26/27) %
		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	55.9	42.6	46.3	46.3	0.0	3.7	9%
Commentary		<p>This represents the Committee's share of the costs associated with developing guidance for parties, candidates and agents for Welsh Local Government polls in 2027. It also includes supporting the programme of electoral reform in Wales and updating our core guidance resources in light of legislative changes or feedback. We also provide a year-round advice service to parties and campaigners which answers their queries and provides tailored and targeted support through webinars and advice surgeries. We will also deliver bespoke training packages tailored to each party. This ensures the regulated community has an understanding of the laws, their obligations and aims to support high levels of compliance.</p>						
Sub-total		267.7	204.6	221.9	216.1	5.8	17.3	8%
Communications policy and research	Campaigns & corp identity	46.2	1111.6	1707.9	47.9	1660.0	596.3	54%
Commentary		<p>This represents the Committee's share of total costs of advertising campaign costs for the 2026 Senedd elections and the 2027 Local Government elections in Wales. Our campaigns straddle two financial years, so this budget covers two campaigns:</p>						

		2024-25 Actual outturn £000s	2025-26 Budget £000s	2026-27 Estimate £000s	2026-27 Estimate Core £000s	2026-27 Estimate Event £000s	Variance (25/26 vs 26/27) £000s	Variance (25/26 ch 26/27) %
		<ul style="list-style-type: none"> Part 2 of May 2026 Senedd elections: Advertising costs (1 April- registration deadline) and post-campaign tracking research to help us evaluate our campaign performance Part 1 of May 2027 local elections: Producing/updating the campaign creative, advertising costs (until 31 March), pre-campaign tracking research to establish baseline data, and voter information resources (such as posters and social media graphics). The budget also covers the costs of any necessary changes to voter-facing forms throughout the financial year due to legislation change. 						
Digital Communication & Voter Engagement		77.1	171.0	184.0	63.0	121.0	13.1	8%

Commentary

This represents the Committee's share of the total costs of work by the Commission's Digital Communications and Voter Engagement team; running a Youth Voice network for Wales working with young people across Wales who will provide their feedback and input on our education resources; building on our existing political literacy work by digitising our teacher and youth practitioner training; making further improvements to our resources for voters with accessibility needs and providing support to voters who register anonymously; scaling up projects to support under registered communities to engage in democracy including with housing association residents and foreign nationals living in Wales. We will adapt this work to account for automatic registration if required; developing and maintaining our bilingual website, digital tools, and social media channels; producing content for Wales and in Welsh language ahead of May 2026 and May 2027 elections; supporting teams across the

		2024-25 Actual outturn £000s	2025-26 Budget £000s	2026-27 Estimate £000s	2026-27 Estimate Core £000s	2026-27 Estimate Event £000s	Variance (25/26 vs 26/27) £000s	Variance (25/26 ch 26/27) %
		Commission to publish information in English and Welsh for our diverse stakeholders, including voters, electoral administrators and campaigners. A team restructure separating Digital Communications and Voter Engagement has driven movements to the budget requirements. Event costs have remained flat year on year.						
	External communications	60.4	66.8	74.4	52.4	22.0	7.7	11%
		Commentary 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 deliverings its public information function to provide support and guidance to voters ahead of the 2026 elections.						
	Research	30.7	39.7	73.9	28.9	45.0	34.2	86%
		Commentary This represents the Committee's share of the total cost of research activities such as our annual public opinion tracker survey and our survey of children and young people's attitudes to democracy and politics; research work that enables us to report effectively on May 2026 and May 2027 elections.						

		2024-25 Actual outturn £000s	2025-26 Budget £000s	2026-27 Estimate £000s	2026-27 Estimate Core £000s	2026-27 Estimate Event £000s	Variance (25/26 vs 26/27) £000s	Variance (25/26 ch 26/27) %
		53.4	35.8	39.4	39.4	0.0	3.7	10%
Policy		<p>Commentary</p> <p>This represents the Committee's share of business as usual policy activities, including work to support the Welsh Government and Senedd to consider policy proposals and legislation, including any new proposals that may be brought forward following the May 2026 Senedd elections.</p>						
Sub-total		267.8	1424.7	2079.6	231.6	1848.0	654.9	46%
Total direct costs		929.6	1753.8	2434.3	574.5	1859.8	680.5	39%
Indirect costs								
		530.9	647.8	703.9	703.9	0.0	56.1	9%
Resource		<p>Commentary</p> <p>Increase driven by (1) IT increases associated with the overall growth in the size of the Commission, improving IT security and ensuring cyber security is resolute, additional roles required in IT, the full year effect of changes in 2025/26 and continued focus on modernising technology. (2) The impact of growth in a number of teams associated with addressing gaps in capacity and capability including Finance (Project Accountants to support the execution of the Corporate Plan and the reporting requirements), Procurement (Procurement Specialists to help drive best practices and search for efficiencies) and HR (Apprentices, Recruitment Costs, Talent Acquisition</p>						

