

Financial implications of the Senedd Cymru (Member Accountability and Elections) Bill

December 2025

1. Introduction

- 1.** The Senedd Cymru (Member Accountability and Elections) Bill¹ (the Bill) and Explanatory Memorandum² (EM), including the Regulatory Impact Assessment (RIA), were introduced by Julie James MS, Counsel General and Minister for Delivery (the Counsel General) on 3 November 2025.
- 2.** During her oral statement on the Bill's introduction, the Counsel General said the purpose of the Bill is to “enhance the accountability of Members of the Senedd by strengthening the systems that regulate and sanction our behaviour and conduct”.³
- 3.** The Bill aims to enhance the accountability of Members of the Senedd by:
 - providing a mechanism to recall an elected Member, removing them from office during their term on the basis of the expressed will of voters in the relevant constituency;
 - strengthening the Senedd's standards process as considered by the Standards of Conduct Committee, including a requirement that each Senedd must establish a mandatory Standards of Conduct Committee and through the appointment of lay members;
 - providing more flexibility to the Commissioner for Standards to proactively consider concerns regarding the conduct of Members of the Senedd;
 - amending the Welsh Ministers' power in the Government of Wales Act 2006 to make provision about the conduct of Senedd elections, in particular by placing a duty upon Welsh Ministers to make provision prohibiting the making or publishing of false statements of fact.⁴
- 4.** The Finance Committee (the Committee) took evidence on the financial implications of the Bill on 20 November 2025⁵, from:
 - Julie James MS, Counsel General and Minister for Delivery;

¹ [Welsh Government, Senedd Cymru \(Member Accountability and Elections\) Bill](#)

² [Welsh Government, Explanatory Memorandum](#)

³ [Plenary, RoP, 4 November, paragraph 150](#)

⁴ [Welsh Government, Explanatory Memorandum](#), page 3

⁵ [Finance Committee, Agenda, 20 November 2025](#)

- Ryan Price, Head of Senedd Policy, Welsh Government;
- Will Whiteley, Deputy Director, Senedd Reform, Welsh Government.

5. Policy scrutiny of the Bill was undertaken by the Member Accountability Bill Committee.⁶

6. The Legislation, Justice and Constitution Committee also considered the Bill in accordance with matters which fall within its remit.⁷

⁶ Member Accountability Bill Committee

⁷ Legislation, Justice and Constitution Committee

2. Financial implications of the Bill

Summary of costs

7. The costs included in the RIA are appraised across a 10-year period between 2026-27 and 2035-36. This includes two Senedd election cycles, which the Welsh Government considers “sufficient for the estimated costs to reach a steady state”.⁸

8. The total cost of the Bill over the appraisal period is estimated to be in the range of £262,600 – £1,289,600. This is entirely made up of administrative costs, with no cost-savings, compliance costs or other costs identified.⁹

9. Total administrative costs include transitional costs of £262,600 and recurrent costs of between £0 – £1,024,000. This comprises:

- the unit cost for Electoral Administrators to administer a Senedd recall poll in a single constituency (“circa” £274,900);
- opportunity costs for Welsh Government staff during 2026-27 to make the regulations setting out the detailed rules of conduct of a recall poll (£190,800);
- costs to the Senedd Commission for developing guidelines (estimated to range from £72,000 – £75,000). This includes one-off opportunity costs (£64,800) and one-off costs for the procurement of external legal advice and academic research (£7,000 – £10,000).¹⁰

10. The RIA does not identify any additional costs to the Electoral Commission.¹¹

11. The estimated cost to the Senedd Commission for recruiting lay members ranges from £13,000 – £28,000 per Senedd, including £8,000 in opportunity costs and £5,000 – £20,000 for advertising and external recruitment consultancy. Annual remuneration costs for lay members is estimated to range between £0 – £87,200, while annual ICT support costs are estimated at £0 – £10,500.¹²

⁸ Welsh Government, Explanatory Memorandum, pages 37 and 43

⁹ Welsh Government, Explanatory Memorandum, pages 38-39

¹⁰ Welsh Government, Explanatory Memorandum, page 38

¹¹ Welsh Government, Explanatory Memorandum, page 38

¹² Welsh Government, Explanatory Memorandum, page 38

12. Following engagement with the Commissioner for Standards, no additional costs have been identified in relation to the power to undertake own initiative investigations.¹³

13. Addressing the Welsh Government's approach to estimating the costs of implementing the Bill, the Counsel General referred to "a whole series of detailed discussions with stakeholders" but highlighted:

*"... obviously, this is a new system, and it's being imposed on a new electoral system, so we've had to make some assumptions around that. They are based on, we think, good evidence for why the assumption is as it is, but we don't have very much in the way of historical data to base it on."*¹⁴

14. In terms of the cost estimates for the recall poll specifically, the Counsel General reflected on the UK Parliament's experience:

*"... there haven't been very many, and, in half of those, the Member has resigned, and so no poll has had to take place. So, we're assuming these are very rare, with perhaps one a Senedd cycle, two if you're really unlucky. So, we've made assumptions like that, but, again, nobody will know until we're actually running this."*¹⁵

15. The Counsel General told us the RIA assumes that lay members will be appointed despite this being a permissive rather than a mandatory provision in the Bill, and indicated that the Senedd Commission has developed these figures. She went on to say:

*"I am expecting the committees that are looking at this to take a view as to what to do with that permission, if you like. I think it's obvious already that some of those will turn into duties rather than powers. We've tried to reflect some of that in our cost estimates for the Bill."*¹⁶

¹³ Welsh Government, Explanatory Memorandum, page 38

¹⁴ Finance Committee, RoP, 20 November 2025, paragraph 224

¹⁵ Finance Committee, RoP, 20 November 2025, paragraph 227

¹⁶ Finance Committee, RoP, 20 November 2025, paragraph 225

Benefits

16. The Welsh Government states that, while the changes associated with the Bill are envisaged to result in a number of benefits, it has not been possible to monetise the benefits at this stage.¹⁷

17. The RIA includes some examples of non-monetary benefits:

- enhancing democratic accountability by giving the electorate the final say on whether a Member should be removed from office;
- improving public trust in democratic institutions by enabling the removal of Members whose behaviour is considered to have seriously breached the Code of Conduct;
- providing the Senedd with sufficient powers to address serious misconduct by Members, introducing recall as an ultimate sanction beyond temporary suspension;
- strengthening the Senedd's standards process by introducing independent lay members to the Standards of Conduct Committee, adding external expertise and reducing perceptions of politicisation and partisanship;
- strengthening the Senedd's standards process by giving the Commissioner for Standards the power to initiate investigations independently, providing flexibility to uphold the standards expected of Members, as set out in the Code of Conduct.¹⁸

18. When asked what analysis the Welsh Government has undertaken to determine potential quantifiable benefits, the Counsel General said:

*"We haven't tried to quantify them, but there are clearly a series of benefits here that I just don't think lend themselves to that kind of monetisation at all, really. So, we've tried to separate out the actual costs of doing it from the benefits overall, but I don't think they can be quantified in that sense."*¹⁹

¹⁷ Welsh Government, Explanatory Memorandum, page 41

¹⁸ Welsh Government, Explanatory Memorandum, page 52

¹⁹ Finance Committee, RoP, 20 November 2025, paragraph 237

Recall poll

19. The Bill will introduce a system of recall that allows the electorate to directly hold Members to account. While the detailed rules for a recall poll will be set out in secondary legislation, the RIA notes that the drafting of the Bill “makes provision for a system that is as similar to Senedd General Election as is possible”. This includes using the same polling stations and polling districts and similar provisions in respect of postal votes, the production of polling cards and ballot papers, and timing.²⁰

Unquantified costs and disbenefits

20. Following engagement with the Electoral Management Board, the RIA identifies a “number of potential areas of variance in respect of the administration of a recall poll”:

- the absence of a nominations process would save staff time, though this is of limited relevance as it is not usually reclaimed;
- savings if ballot papers are smaller, though unlikely to be significant;
- postal ballots being issued earlier due to the absence of a nomination process, though unlikely to make a material difference to cost;
- the count may be slightly simpler and require fewer staff or smaller venues, though existing practices are likely to be retained due to the contentious nature of recall polls, limiting cost reductions;
- electoral registration demand could increase, but this is hard to predict and unlikely to differ significantly from a Senedd election.²¹

21. The RIA says:

“... in all cases these are considered to be nominal and as such are not quantified within this RIA.”²²

²⁰ Welsh Government, *Explanatory Memorandum*, pages 44-45

²¹ Welsh Government, *Explanatory Memorandum*, page 40

²² Welsh Government, *Explanatory Memorandum*, page 40

Costs to the Welsh Government

22. The Welsh Government says the costs of administering a recall poll has been assessed in conjunction with the Electoral Management Board, including:

- establishing the costs of administration of the 2021 Senedd election;
- excluding COVID-19 related costs;
- adjusting costs to reflect changes to the electoral system under the Senedd Cymru (Members and Elections) Act 2024 (SC(ME) Act 2024), such as fewer but larger constituencies and a reduced number of ballot papers;
- uplifting costs to current prices using the GDP deflator series;
- accounting for constituency variations and differences between general elections and recall polls.²³

23. In order to calculate the estimated 2025 costs, the RIA provides minimum (£60,775), maximum (£182,616) and average (£98,393) figures for costs to electoral administrators to administer the 2021 Senedd general election. The total of the average cost to electoral administrators across the 40 constituencies in 2021 has been divided by 16 to account for the new number of constituencies (including the removal of savings identified in the RIA to the SC(ME) Act 2024), then uprated for inflation. As a result, the RIA identifies the unit cost of administering a Senedd recall poll in a single constituency to be circa £274,900.²⁴

24. To estimate the cost of administering a recall poll, the Counsel General said the Welsh Government has “tried to average out the difference in size and geographical area for each of the constituencies”. When asked whether figures from the UK General Election 2024 were used given the pairing of Westminster constituencies for the 2026 Senedd Election, the Counsel General said:

“I don't think we have used those, no. We've used our own election figures, because they're the ones that we have best access to. But we haven't got any administration cost data for the 2016 ones.”²⁵

²³ Welsh Government, Explanatory Memorandum, page 45

²⁴ Welsh Government, Explanatory Memorandum, pages 46

²⁵ Finance Committee, RoP, 20 November 2025, paragraphs 245 and 250

25. A comparison of estimated 2021 costs and the calculated 2025 costs is shown in Table 1.²⁶

Table 1: Summary of electoral administrator costs

	Estimate (2021 prices)	Estimate (2025 prices)
Electoral administrators	£13,710	£16,502
Polling stations	£102,714	£123,637
Postal votes	£46,882	£56,432
Poll cards	£33,146	£39,897
Count	£35,398	£42,608
Other	£14,133	£17,012
Sub-total	£245,982	£296,089
SC(ME) Act 2024		-£21,157
Total		£274,931

Source: Welsh Government, Explanatory Memorandum²⁷

26. As local authority officials (electoral administrators) are funded for the administration of Senedd elections, the RIA notes that these costs ultimately fall to the Welsh Government.²⁸

27. The Welsh Government says it is not possible or appropriate “to assess the likely frequency of behaviour of Members that may lead to a recall sanction”. Therefore, costs are presented as a “unit cost” per recall poll, “based on a number of assumptions underpinning the likely cost of an election being held on the basis [of] the new electoral system”.²⁹

28. The Counsel General explained the rationale for presenting the cost of a recall as a “unit cost”:

“... we’ve assumed that they’d be very rare. One a Senedd term would be too many. So, they’re demand-led. And it’s dependent

²⁶ Welsh Government, Explanatory Memorandum, page 46

²⁷ Welsh Government, Explanatory Memorandum, page 46

²⁸ Welsh Government, Explanatory Memorandum, page 44

²⁹ Welsh Government, Explanatory Memorandum, page 41

on the cohort of Members, and how the standards of conduct committee takes a view.”³⁰

29. The RIA identified opportunity costs of £190,800 to the Welsh Government in 2026-27 in relation to staff time needed to develop regulations under new delegated powers. As making these regulations will be the first exercise of the new power, the Welsh Government notes inherent uncertainties in estimating the time required to develop comprehensive regulations.³¹

30. Despite these uncertainties, the Counsel General said “I’m pretty confident that the regulations can be delivered inside that estimate of opportunity costs”. She added:

“The statutory instrument will be a mini version of the conduct Order, so we don't think it's a particularly onerous task to do.”³²

31. The EM notes that specific engagement and consultation plans will be developed for the production of the necessary secondary legislation on the detailed rules of a recall poll.³³

Costs to the Senedd Commission

32. The Bill requires the Standards of Conduct Committee to produce sanctioning guidance, including consultation requirements prior to Senedd ratification. The RIA indicates that supporting this work will incur an estimated one-off opportunity cost for the Senedd Commission of £64,800 for staff time, plus £7,000 – £10,000 for external legal advice and academic research. Total costs are projected at £71,800 – £74,800 and are expected to be incurred in 2026-27.³⁴

33. In her written evidence to the Member Accountability Bill Committee, the Chief Executive and Clerk of the Senedd said “it is not anticipated that the process of initiating a recall poll would entail additional work for the Standards of Conduct Committee or Senedd beyond business as usual”. Furthermore, no proactive awareness-raising of a recall poll in a constituency is anticipated by the Senedd Commission, with media queries and other tasks, such as publishing recall poll results and inducting a new Member, expected to require negligible staff time.³⁵

³⁰ Finance Committee, RoP, 20 November 2025, paragraph 243

³¹ Welsh Government, Explanatory Memorandum, pages 38 and 41

³² Finance Committee, RoP, 20 November 2025, paragraph 241

³³ Welsh Government, Explanatory Memorandum, page 33

³⁴ Welsh Government, Explanatory Memorandum, page 48

³⁵ Written evidence: MAB09 – Chief Executive and Clerk of the Senedd

Costs to the Electoral Commission

34. The RIA notes that the Electoral Commission’s responsibilities will extend to Senedd recall polls, including:

- reporting on the administration of any recall poll;
- keeping under review and submitting reports to Welsh Ministers on devolved matters;
- attending a recall poll;
- preparing a code of practice for the attendance of observers at a recall poll;
- being consulted on any change to electoral law made by regulation (and to consent to the setting of spending limits);
- giving advice and assistance.³⁶

35. The RIA states that these duties “are all considered to be capable of being met within existing resources and financial envelopes”.³⁷

36. The Counsel General referred to close engagement with the Electoral Commission during the Bill’s development, as the Welsh Government “wanted them to be sighted on the implications all the way through, and to be happy with it”. She continued:

“... we’ve asked them for their assessment of the likely cost implications, and they were very satisfied that the cost would be negligible and would be met from existing budgets, because that’s basically business as usual for them. So, they were pretty clear that they weren’t expecting it to be anything other than business as usual.”³⁸

37. In its written evidence to the Member Accountability Bill Committee, the Electoral Commission states:

“... we would expect to provide information for voters about the process for any recall poll through our website and social

³⁶ Welsh Government, Explanatory Memorandum, page 47

³⁷ Welsh Government, Explanatory Memorandum, page 47

³⁸ Finance Committee, RoP, 20 November 2025, paragraph 254

media channels, and would provide guidance for Constituency Returning Officers to support delivery of the poll. Delivering these activities may require some additional resources, but this is not likely to be significant.”³⁹

38. Furthermore, the Electoral Commission says its role in securing compliance with regulations relating to recall poll campaign expenses and donations is currently unclear. Depending on the scope of these responsibilities, the Electoral Commission indicates that “there may be some further financial implications”.⁴⁰

Costs to political parties

39. The RIA notes that introducing a recall system could lead to additional costs or savings for political parties. However, the Welsh Government says these costs and savings cannot be quantified as they could differ greatly, depending on whether a party’s Member faces recall and the party’s level of involvement in the process:

“For example, whether the political party would support the Member in a recall poll, or alternatively may be seeking their removal in order for the next eligible person on their party list to be returned. This would have a significant bearing on any potential costs and savings. As these decisions are not as a direct result of the Bill and are yet to be taken by political parties, they are not possible to quantify and costs and savings are unknown at this stage.”⁴¹

40. When asked about the Welsh Government’s engagement with political parties regarding any potential costs associated with the Bill, the Counsel General indicated that officials attended meetings of the Senedd Parties Panel⁴² convened by the Electoral Commission in July and November. The Counsel General’s official added:

“I think it’s very difficult to make an assumption on how parties will campaign or not campaign or behave or spend during a recall poll. I think it’s very difficult to lift and try and extrapolate from the UK figures. So, it was very much us explaining the policy intent, but without that baseline of how political parties

³⁹ Written evidence: MAB15 – Electoral Commission

⁴⁰ Written evidence: MAB15 – Electoral Commission

⁴¹ Welsh Government, Explanatory Memorandum, page 51

⁴² Senedd Parties Panel

are likely to behave. We thought it was very difficult to make an assessment of what those costs are likely to be in reality.”⁴³

Lay members

Costs to the Senedd Commission

41. The Bill will allow the Senedd to appoint individuals who are not Members of the Senedd (lay members) to sit on the Standards of Conduct Committee and any sub-committee of that Committee. It specifies that the number of lay members may not exceed the number of elected members of the Senedd on the Committee and the term of office for a lay member is a fixed period of no more than six years.⁴⁴

42. The RIA assumes that advertising, recruiting, and appointing lay members will be comparable to other public appointments undertaken by the Senedd, with cost estimates based on experiences from the past two years. A cost of between £13,200 – £28,200 per Senedd is anticipated, including £8,200 in opportunity costs relating to staff time and £5,000 – £20,000 for advertising and possible external recruitment company support. As the timing and frequency of recruitment is uncertain, costs have been annualised from 2026-27.⁴⁵

43. We questioned why the potential range of costs for lay member appointments is presented per four-year Senedd term, despite the Bill permitting appointments for up to six years. In response, the Counsel General said “we think any Commission would be fairly foolhardy to appoint all the lay people for the same term of office”. She suggested that a staggered approach to appointments would be preferable to avoid an “all-in, all-out” scenario, which could lead to a loss of continuity and expertise.⁴⁶

44. Addressing the decision to include the cost of using an external recruitment company, the Counsel General explained:

“... we've discussed potential approaches with the Senedd Commission officials, and we've been very guided by the Senedd Commission officials' view of this. So, we've concluded that it would be reasonable to assume that the process of advertising for recruiting and appointing lay members would

⁴³ Finance Committee, RoP, 20 November 2025, paragraph 270

⁴⁴ Welsh Government. Explanatory Memorandum, pages 69-71

⁴⁵ Welsh Government. Explanatory Memorandum, pages 48-49

⁴⁶ Finance Committee, RoP, 20 November 2025, paragraphs 262-263

be comparable to public appointments previously undertaken by the Senedd, and the experience of the Senedd conducting such exercises in the past. That includes the cost of advertising. They do use external recruitment companies, to ensure the best candidates are attracted.”⁴⁷

45. It is uncertain whether future Seneddau would use the power in the Bill to appoint lay members, how many would be appointed, or what remuneration would apply. Due to these uncertainties, the RIA says the Senedd Commission “identified the remuneration and ICT costs of lay members as an unknown cost”.⁴⁸

46. In her written evidence, the Chief Executive and Clerk of the Senedd said “my view is that the most appropriate identification of the remuneration costs associated with lay members is ‘unknown’”. While acknowledging that the Independent Parliamentary Standards Authority has set a £600 daily rate for House of Commons lay members, she suggested this may not be appropriate “because the role of lay Members in the Senedd Committee’s work is unknown”. She continued:

“The illustrative cost range provided by the Welsh Government is therefore not based on information I provided. However, I understand Welsh Government’s wish to provide their reasoned, estimated costs.”⁴⁹

47. The written evidence also highlighted a need to consider the induction and ongoing support to any lay members appointed by the Senedd, if the legislation is passed.⁵⁰

48. For the purposes of the RIA, the Welsh Government provides an illustrative cost range of £0 – £87,200 per annum and assumes that any annual costs would begin in 2026-27. In terms of estimating the upper end of potential costs, the Welsh Government assumes:

- the maximum number of lay members are appointed (the same as the number of elected members of the Senedd sitting on the Committee),

⁴⁷ Finance Committee, RoP, 20 November 2025, paragraph 260

⁴⁸ Welsh Government, Explanatory Memorandum, page 49

⁴⁹ Written evidence: MAB09 – Chief Executive and Clerk of the Senedd

⁵⁰ Written evidence: MAB09 – Chief Executive and Clerk of the Senedd

- the number of elected members sitting on the Committee is six (reflecting a larger Senedd),
- a remuneration rate of £600 per day, and
- that lay members would sit for 25 days per year.⁵¹

49. However, the Welsh Government says:

*"It is important to note that there is low confidence in the accuracy of the assumptions made."*⁵²

50. Acknowledging the uncertainty with the illustrative range of costs presented, the Counsel General said:

*"... the estimated cost is a range from nothing to eighty-seven-and-a-bit thousand pounds, to reflect the range of things that might happen. So, I guess we thought it would be helpful to set out the widest range of costs possible and not make any real assumptions, because, until the Commission comes to some conclusions, it's hard to know."*⁵³

51. The Counsel General told us she anticipates amendments during the scrutiny process to make some provisions mandatory, which would enable firmer cost estimates.⁵⁴

52. The RIA also identifies ICT support costs of £7,000 per member per four-year Senedd term, providing an annualised range of £0 – £10,500.⁵⁵

53. When asked about the funding arrangements for lay members, the Counsel General indicated that it would be reasonable to expect a separate budget expenditure line for the appointment of lay members, distinct from the Standards Commissioner's budget, but this would be a matter for the Senedd Commission.⁵⁶

54. In terms of the approach to scrutiny of the budget line for lay members, the Counsel General said it will depend on the Bill's development, such as the

⁵¹ Welsh Government Explanatory Memorandum, pages 49-50

⁵² Welsh Government Explanatory Memorandum, page 49

⁵³ Finance Committee, RoP, 20 November 2025, paragraph 263

⁵⁴ Finance Committee, RoP, 20 November 2025, paragraph 264

⁵⁵ Welsh Government Explanatory Memorandum, page 50

⁵⁶ Finance Committee, RoP, 20 November 2025, paragraphs 290 and 292

possibility of a “separate appeals committee or a sub-committee of the standards committee”:

“If you end up with a standards commissioner and lay members on a standards committee and a sub-committee of that committee, you can see it could be scrutinised as part of the standards line, if you like. But if you end up with an appeal committee that's separate to the standards committee and is a stand-alone committee in its own right, then clearly, that wouldn't be appropriate. So, I think we're going to have to take a view once we see the eventual shape of that.”⁵⁷

55. In relation to the cost of the appeals process, the Counsel General said “we’ve attempted to include it in the maximum envelope” but highlighted the uncertainty over its final structure, whether that will operate as a standalone committee or as a sub-committee of the Standards of Conduct Committee.⁵⁸

Commissioner for Standards

56. The Bill enables the Commissioner for Standards to carry out an investigation of a breach of obligation by a Member or concerns about a Member’s conduct, of their own initiative. Having consulted the Commissioner for Standards, the RIA says:

“... no additional costs have been identified in association with this element of the legislation. This is informed by the Commissioner’s experience as the Northern Ireland Assembly Commissioner for Standards – a role which included the power to initiate investigations.”⁵⁹

57. In her written evidence, the Chief Executive and Clerk of the Senedd said “the opportunity costs arising from this power were considered to be negligible, unknown, and arising from within existing resources”. She went on to say:

“By association the staff time involved in supporting a Standards of Conduct Committee in reporting on any cases arising from the Commissioner’s power were also considered to be negligible, unknown, and arising from within existing resources. As such, I did not identify any additional costs for this

⁵⁷ Finance Committee, RoP, 20 November 2025, paragraphs 294-295

⁵⁸ Finance Committee, RoP, 20 November 2025, paragraphs 315 and 319

⁵⁹ Welsh Government. Explanatory Memorandum, page 50

power, as is reflected in the Welsh Government's Explanatory Memorandum."⁶⁰

58. When asked to elaborate on the conclusion that no additional costs would be incurred, the Counsel General explained:

*"... the commissioner was pretty clear that they didn't think there were any additional costs in that... they obviously thought they would be able to manage it inside the current envelope. It's not for us to say. That was very vehemently the view taken."*⁶¹

59. The Counsel General's official added that, in addition to his experience of own-initiative investigations in his previous role, the Commissioner for Standards noted that "any area in which they may conduct an own-initiative inquiry was also very likely to attract complaints in any event".⁶²

60. Appearing before the Member Accountability Bill Committee, the Commissioner for Standards said he envisaged using the power to initiate investigations "very rarely", having only used the power once as the Northern Ireland Assembly's Commissioner for Standards. He added:

*"In the six years in which I've been working in the Senedd, I can think of only two occasions on which I would have considered using this power, had it been available. Both of these were alleged misconduct that had been widely reported in the media, and I think it sends the wrong signal to the public when they read of that and no action is taken. Now, no action could be taken because, much to my surprise, not a single person made a complaint about either of the incidents, perhaps assuming that someone else was going to do that."*⁶³

Affordability assessment

61. The Welsh Government's affordability assessment focuses only on actual cash costs and cash-releasing benefits over the same period as the RIA. This excludes opportunity costs associated with existing staff time as they do not represent additional spending.⁶⁴

⁶⁰ Written evidence: MAB09 – Chief Executive and Clerk of the Senedd

⁶¹ Finance Committee, RoP, 20 November 2025, paragraph 288

⁶² Finance Committee, RoP, 20 November 2025, paragraph 302

⁶³ Member Accountability Committee, RoP, 11 November 2025, paragraph 131

⁶⁴ Welsh Government, Explanatory Memorandum, page 60

62. The RIA says the financial costs have been adjusted for inflation during the appraisal period using the Office for Budget Responsibility Gross Domestic Product deflator projections⁶⁵, which extend to 2029-30. Beyond that, a 1.9 per cent rate is assumed. The Welsh Government notes that inflation remains uncertain and will monitor its impact on the Bill's costs.⁶⁶

Table 2: Financial costs to the Senedd Commission 2026-27 to 2035-36 (£)

	2026-27	2027-28	2028-29	2029-30	2030-31
Total cost					
Minimum	7,000	0	0	0	0
Maximum	111,100	101,100	101,100	101,100	101,100
Total adjusted for inflation					
Minimum	7,100	0	0	0	0
Maximum	113,000	104,800	106,800	108,900	110,900

	2031-32	2032-33	2033-34	2034-35	2035-36
Total cost					
Minimum	0	0	0	0	0
Maximum	101,100	101,100	101,100	101,100	101,100
Total adjusted for inflation					
Minimum	0	0	0	0	0
Maximum	113,000	115,200	117,400	119,600	121,900

Source: Welsh Government, Explanatory Memorandum⁶⁷

63. The Counsel General explained why the affordability assessment focuses on costs for the Senedd Commission and does not include costs to other organisations:

“We expect the Bill to result in cash costs as opposed to opportunity costs for the Commission. The Welsh Government

⁶⁵ Office for Budget Responsibility, Economic and fiscal outlook, March 2025

⁶⁶ Welsh Government, Explanatory Memorandum, page 60

⁶⁷ Welsh Government, Explanatory Memorandum, page 60

*costs are all opportunity costs, and so are not included, really, and the unit cost isn't annualised, so it's not included in the affordability assessment because they're unit costs. The cost of running a recall poll would be an additional cost to that, I guess... we've gone through a process of trying to work out what an annualised cost might look like, and then what the unit costs look like. That's where we've arrived."*⁶⁸

Timing

64. The Counsel General described the timing of the Bill as “exceptional”, highlighting that “any slippage at all will mean that it falls off the edge”:

*“... this is not an optimal position to be in. Normally, we would introduce a Bill that allowed the committees to have enough room to manoeuvre and to come to the right sorts of conclusions. This isn't the right committee to say some of the things about what's not in the Bill, but some of the reasons that the things that are not in the Bill are not in the Bill is because there isn't time to do it properly, and anything that causes the timetable to slip loses the Bill completely.”*⁶⁹

Committee view

65. The Committee notes the aims of the Bill and its intention to enhance the accountability of Members of the Senedd by strengthening the systems that regulate and sanction Members’ behaviour and conduct. We acknowledge the inherent challenges in estimating the cost associated with introducing a new recall mechanism within a reformed electoral framework, and note the Counsel General’s explanation that the assumptions underpinning the cost estimates are informed by stakeholder engagement and constrained by limited historical data.

66. The Committee also acknowledges the significant uncertainty surrounding the potential costs of appointing lay members to the Standards of Conduct Committee, given the permissive nature of the Bill’s provisions. We consider these risks to be appropriately mitigated by the inclusion of broad cost ranges in the RIA. However, we expect the RIA to be revised should the Bill be amended, for

⁶⁸ Finance Committee, RoP, 20 November 2025, paragraph 307

⁶⁹ Finance Committee, RoP, 20 November 2025, paragraphs 328 and 331

example, to introduce a mandatory framework for appointing lay members or to alter provisions relating to their number.

67. The Chief Executive and Clerk of the Senedd's written evidence highlights that induction and ongoing support requirements for lay members have not been costed and we would like to understand the financial implications of undertaking these activities.

68. In terms of the funding arrangements for lay members, we agree with the Counsel General that it is reasonable to expect a distinct budget expenditure line for lay members, separate from the budget for the Commissioner for Standards. This transparent approach would enable the Finance Committee and other relevant committees to monitor expenditure and facilitate effective scrutiny of costs associated with the Bill's implementation.

69. The Committee notes that the Bill introduces a power for the Commissioner for Standards to initiate investigations into Members' conduct without a formal complaint. We note that the RIA identifies no additional costs arising from this provision and the Chief Executive and Clerk of the Senedd's view that opportunity costs are "considered to be negligible, unknown, and arising from within existing resources".⁷⁰ We also acknowledge the Commissioner for Standard's experience in Northern Ireland and the indication that own-initiative investigations are likely to coincide with matters that would attract complaints in any event. Nevertheless, we believe that even infrequent use of this power could require staff time, which may displace other work or require additional capacity. We are therefore concerned that the RIA does not adequately consider potential opportunity costs.

70. The Committee notes the Counsel General's comments regarding the exceptional timing of the Bill and the risk that any delay could result in the legislation failing to progress. While we recognise the importance of meeting the legislative timetable, we are concerned that the compressed scrutiny period may compromise the robustness of the Bill and its supporting financial estimates. We believe that effective scrutiny is essential to ensure that the Bill delivers its intended objectives and represents value for money. Rushing the process could lead to gaps or insufficient clarity on cost implications, which may create challenges during implementation.

Conclusion 1. The Committee is broadly content with the financial implications of the Bill as set out in the Regulatory Impact Assessment, subject to the comments and recommendations in this report. Should there be significant

⁷⁰ Written evidence: MAB09 – Chief Executive and Clerk of the Senedd

changes to the Regulatory Impact Assessment as a result of the recommendations made in this report and further scrutiny, the Committee may consider those changes in more detail.

Recommendation 1. The Committee recommends that the Counsel General continues to work closely with electoral administrators, the Electoral Commission, political parties, the Senedd Commission and the Commissioner for Standards to refine cost estimates during the Bill's passage through the Senedd, ensuring the Regulatory Impact Assessment remains robust and reflects any changes to the Bill.

Recommendation 2. The Committee recommends that the Counsel General, in consultation with the Senedd Commission, establishes the estimated cost of providing lay members with an induction and ongoing support, and incorporates this into a revised Regulatory Impact Assessment after Stage 2.

Recommendation 3. The Committee recommends that the Senedd Commission establishes a separate and clearly identifiable budget line for lay member costs in its annual budget documentation to ensure clarity and transparency.

Recommendation 4. The Committee recommends that the Counsel General, in consultation with the Senedd Commission and the Commissioner for Standards, establishes the opportunity costs associated with undertaking own-initiative investigations and incorporates this into a revised Regulatory Impact Assessment after Stage 2.

3. Post-implementation review

71. The RIA states that there is no current plan for a post-implementation review of the Bill. The Welsh Government notes that monitoring the impact of measures to strengthen the Senedd's standards process will be the responsibility of the Senedd, the Senedd Commission, and the Commissioner for Standards. It also suggests that the Senedd may wish to review the recall system after its first use.⁷¹

72. The Welsh Government indicates that it will continue monitoring the Bill's impact during scrutiny and implementation, updating impact assessments as needed, including when developing regulations for the recall system.⁷²

73. Given that the Bill originates from the Senedd Standards of Conduct Committee's recommendations and establishes systems for Members, the Counsel General said that responsibility for assessing the Bill's effectiveness lies with the Senedd. She went on to say:

"I might go so far as to say that you might want to wait until a recall poll has actually happened in order to do that review, because, otherwise, what would you be reviewing exactly?"⁷³

74. While the Bill does not include a formal review provision, the Counsel General told us:

"... we're sort of hoping the committees will make that point for us... the Government takes the view that, whatever the committees want to do, we will endeavour to give effect to. And we'll obviously continue to talk to the Commission itself all the way through this process as well."⁷⁴

Committee view

75. The Committee notes that the Bill does not include a formal provision for post-implementation review. While the Welsh Government has indicated that it will monitor impacts during the Bill's scrutiny in the Senedd and subsequent implementation, we believe that a structured review mechanism is essential to ensure the legislation operates as intended and delivers value for money. We

⁷¹ Welsh Government, Explanatory Memorandum, page 61

⁷² Welsh Government, Explanatory Memorandum, page 61

⁷³ Finance Committee, RoP, 20 November 2025, paragraph 309

⁷⁴ Finance Committee, RoP, 20 November 2025, paragraph 312

agree with the Counsel General's observation that such a review would be most meaningful after the first recall poll has taken place, as this would provide a clear basis for evaluation. We believe that the post-implementation review should also include an assessment of the actual costs and benefits arising from the Bill and we urge the Welsh Government to discuss this with electoral administrators, the Electoral Commission, the Senedd Commission and political parties in order to establish clear mechanisms to effectively monitor the changes.

Recommendation 5. The Committee recommends that the Bill be amended to include a statutory requirement for a post-implementation review, triggered by the first use of the recall poll, and that the review should include an assessment of the associated costs and benefits of the legislation.