

Representation of the People (Electoral Registration Without Applications) (Electoral Reform) (Wales) Regulations 2026

October 2026

1. Background

- 1.** Section 3 of the **Elections and Elected Bodies (Wales) Act 2024** (“the 2024 Act”) provides for eligible electors to be added to the local government register in Wales without the individual needing to submit an application, also known as automatic voter registration (“AVR”).
- 2.** Under the provisions, Electoral Registration Officers (“EROs”) will need to verify a person’s identity to satisfy eligibility. They will also need to notify the individual they intend to register, and provide a notice period to allow the elector to request to be registered anonymously, or opt-out of the register entirely. If an elector objects to registration, the ERO must follow the existing process and invite the person to apply themselves for registration.
- 3.** Section 72(5) of the 2024 Act states that before commencing the provisions in section 3, the Welsh Ministers are required to pilot AVR provision. The power to conduct the pilots was set out in section 5 of that Act.
- 4.** The pilots would use “existing local data to identify and verify potential electors”. If the pilots were deemed successful, automatic voter registration could be rolled out across Wales.



Automatic voter registration pilots

5. In January 2025, the Senedd agreed the Representation of the People (Electoral Registration without Applications) (Pilot Scheme) (Wales) Regulations 2025), which enabled Gwynedd, Newport and Powys councils to undertake pilot schemes, along with Carmarthenshire County Council which was not included in the regulations as it would not be adding people to the register.

6. During the pilots, EROs were required to take necessary steps to identify the names and addresses of persons not registered in the register of local government electors. They were required, in general, to locate matching data from at least two sources that identified the unregistered elector.

7. Persons identified had a 60-day notice period during which they could opt out of registration without application or apply for anonymous registration.

8. Under the pilot regulations, EROs would have to inspect relevant records to identify such persons a minimum of four times in a calendar year.

Evaluation of the pilots

9. The Electoral Commission was required to undertake an evaluation of the pilots, and published its report and recommendations in December 2025.

10. We heard from Powys County Council that, overall, the process was successful, they told us:

“It was possible to use local data sets to identify individuals that weren't registered and send them a notice of registration.....We found just over 5,000 individuals, which worked out at approximately 5 per cent of our register. I think there was overall confidence that the people we found were accurate.”

11. The pilots identified and added just over 14,500 new electors to the electoral registers, as well as 1,500 ‘attainers’ (14 and 15 year olds eligible to register). The Commission concluded that the pilots suggested that automatic registration “could be rolled out in Wales and could have a positive impact on the completeness of the electoral registers”. It did, however, make several recommendations to the Welsh Government, including that it should:

- Consider the resources needed to ensure EROs and their teams can deliver a new automatic registration system;
- Assess the overall cost of implementation alongside the likely benefits;

- Consider the optimal timing and frequency of an automatic registration process;
- Consider a reduction in the 'opt out' notification period from 60 days;
- Ensure there is appropriate guidance on data quality and usage;
- Consider the functionality of electoral management software;
- Consider how AVR introduced in Wales is best implemented in order to allow for efficient future integration with any UK-wide system.

2. The 2026 Regulations

12. Following the pilots, the draft **Representation of the People (Electoral Registration without Applications) (Electoral Reform) (Wales) Regulations 2026** ("the Regulations") were laid before the Senedd in June 2026. These would introduce a similar AVR system to the one piloted.

13. In the **Explanatory Memorandum** ("EM") to the Regulations, the Welsh Government stated that it has "considered the findings" of the Electoral Commission's evaluation report and incorporated its recommendations within the Regulations "where appropriate". The EM highlighted the following two amendments to the pilot provision:

- The 60 day 'opt out' notification period would be reduced to 28 days; and
- EROs would be required to conduct an AVR exercise at least once in a calendar year, rather than up to four times.

14. The Regulations were referred to the Local Government, Housing and Planning Committee ("the Committee") for scrutiny, with an initial reporting deadline of 25 September 2026. Under the procedure specified in section 19 of the 2024 Act, a committee charged with scrutiny of electoral reform regulations can recommend that an extended 60-day scrutiny procedure should apply. We considered our approach to scrutiny of the Regulations at our meeting on 16 July 2026 and **agreed to recommend** that the extended 60-day scrutiny procedure should be applied. As our recommendation was not rejected by the Senedd, the extended 60-day scrutiny procedure applied which enabled us to take further evidence on the Regulations.

15. We held formal evidence sessions on **17 September** and **1 October** 2026 to inform our scrutiny of the Regulations. These sessions were supplemented by written evidence from a range of other stakeholders. A list of all evidence presented to the Committee is available in the annex to this report.

Timing for introduction of AVR

16. The Welsh Government intends for automatic voter registration to be introduced in time for the 2027 local government elections. The Electoral Commission referred to the timescales for introduction as “increasingly challenging” in light of the activity electoral teams will need to undertake in order to implement AVR ahead of the election, noting that:

“those timescales are going to be placing a lot of pressure on electoral services teams at a time when they are already delivering the annual canvass this year and when they should be beginning their preparations for the elections next year.”

17. The Commission did acknowledge, however that it would “certainly be something of a missed opportunity if we couldn’t get to a point where AVR could be rolled out ahead of next year’s local elections”.² They went on to say:

“it’s still possible to roll out automatic registration in time for next year’s local government elections. But I think we would say that it is at the point now where if the timescales slip any further, it’s going to become increasingly challenging to deliver those.”

18. The Commission added that “the legislation and the associated implementation activities are being delivered at a later stage than we would ideally expect.”³ This was a frustration also expressed by the Association of Electoral Administrators (“AEA”):

“The fact that legislation is not going to be in place until probably early November now at the earliest as well, and then to expect administrators to literally go the next day and administer this process is really an unusual situation to be in. It doesn’t comply with the

¹ Local Government, Housing and Planning Committee 17 September 2026, Record of Proceedings (“RoP”), paragraph 9

² Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 11

³ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 80

Could principle, where there should be at least a six-month period for people to understand what is required of them.”⁴

19. The Electoral Management Board for Wales (“EMB”) stated that the period up to the May 2027 elections will be “extremely busy”, and “the electoral administration sector could find it difficult to implement the policy in advance” of the 2027 elections “without further resource and support”. However, they believed it to be possible, albeit the risks identified need to be mitigated:

“the momentum and the resource that needs to be put in to make sure any issues they faced are removed and addressed, whether that's from software providers being able to deliver on time, whether it's in relation to the funding that's available, I think it's that responsiveness that's really, really critical if we're to see this be successful for 2027.”⁵

20. Powys County Council concurred that it is possible, saying that “electoral services teams, if any, will pull it off because we do”, but added that colleagues “generally feel quite overwhelmed”⁶.

21. The [WLGA](#) noted that the “current timetable and timing of funding confirmation may limit the ability of local authorities to plan, resource and prepare for rollout as effectively as would be desirable”.

22. The AEA expressed its concerns to us:

“I think our biggest concern is that, if this process appears to be rushed in any way, shape or form, or sufficient time is not given to allow for people to do the work correctly, there's the risk of adding people incorrectly to the register, because those checks haven't been done fully or properly. It's the impact that that has long term on the integrity of the process and on the delivery of elections going forward as well.”⁷

⁴ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 155

⁵ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 152

⁶ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 160

⁷ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 101

23. They went on say that “our biggest concern is that we’ve already run out of time to a certain degree”⁸ and that “there is no ability for anything to slip, and that’s worrying”.⁹

24. Concern over the readiness of electoral management software (“EMS”) systems required by electoral teams to undertake the AVR exercise was raised by some stakeholders, including the Electoral Commission who noted there is still “some uncertainty about when those updates to those systems will be available and ready to support the delivery of automatic registration”.¹⁰ They added that the Welsh Government is managing the risk.¹¹ Concerns around the readiness of software which “teams are so dependent on for delivering this” were also expressed by the AEA.¹²

25. The Minister told us:

“the timetables, or the deadlines, are ambitious, but we’re working closely with key stakeholders and local departments in order to achieve these objectives.

*The Gould principle says that we should not change legislation within six months of an election where that change would affect that election. The timetable is tight, but we are within that limit, so all is good.”*¹³

26. In response to concerns raised in relation to the readiness of EMS systems, a Welsh Government official explained:

*“the software providers, they’re existing, they’ve already got contracts with the 22 authorities. There are three software providers in Wales that operate. What we’re talking about is adding on a workflow process and then a bit of data-matching functionality. We are talking to them almost every day, just to keep an eye on progress. At the moment, we’re confident. We’re keeping it under very, very close review.”*¹⁴

⁸ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 154

⁹ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 159

¹⁰ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 9

¹¹ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 17

¹² Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 154

¹³ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraphs 268-269

¹⁴ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 296

Frequency of registration without application exercise

27. The Regulations propose that an automatic voter registration exercise must be carried out at least once in a calendar year. The pilot regulations had set this at a minimum of four times in a calendar year. The Electoral Commission's evaluation recommended that the Welsh Government consider the timing of the exercises, suggesting that a single process could be carried out "each year between the conclusion of the annual canvass and ahead of any scheduled May elections and that in years without scheduled polls "it would be beneficial also to carry out an exercise ahead of the canvass".

28. In the EM to the Regulations, the Welsh Government states this change will "ease the administrative burden on EROs whilst still providing a regular opportunity to improve the numbers of people on the electoral register". The Electoral Commission noted that reducing the minimum frequency would reduce some of the administrative challenges for EROs during the first year but there could be more flexibility to carry out more than one exercise in future years¹⁵. This was a view shared by the EMB. The Commission told us:

*"even if there was only one exercise per year, it would still potentially be leading to an improvement in the completeness of the registers of somewhere between 2 per cent and 8 per cent, based on the experience from the pilot. So, that's still an important and helpful improvement on the accuracy, compared with where we are at the moment."*¹⁶

29. [One Voice Wales](#) and the WLGA stated that less frequent AVR cycles could reduce administrative burden, costs and ease workloads, but noted that it also carries risks. One Voice Wales stated that less frequent cycles could "negatively affect register completeness, particularly in areas with high population mobility". The WLGA stated that further evidence will be needed to "determine whether it provides an appropriate balance between administrative efficiency and register accuracy".

30. The [Electoral Reform Society](#) ("ERS") Cymru expressed concern that requiring EROs to carry out the exercise once a year "could miss anyone who has moved between the date of the inspection of the records and any election day", and that the exercise ran the risk of becoming another annual canvas. It argued that a "rolling registration process" would be more effective, which

¹⁵ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 49

¹⁶ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 52

could “combine a full exercise annually with notifications within the local authority of any changes”.

31. A Welsh Government official explained that there are still other processes for maintaining the register throughout the course of a year, notably the annual canvass.¹⁷ On the requirement to undertake an exercise at least once a year, the Minister told us that “it is a balance” of where to put resources, acknowledging that electoral teams are very small and that on the whole, the balance is correct.¹⁸

Availability and quality of local data

32. The Electoral Commission explained that the data used by electoral teams to identify eligible electors will be determined by each registration officer, based on their own assessment of the availability of the data and whether it is suitable for the matching purpose that they need to use. We heard that council tax is the largest data set available to all registration officers, and also the data set that, from the pilot schemes, identified the largest number of potential electors. The Commission also referred to other data sets such as education data, which was used during the pilots.

33. In its evaluation of the pilots, the Commission noted that “EROs would need to carefully consider which local data would be most suitable for automatic registration, including when and how often it should be used”. They told us that registration officers would need to take account of how data was compiled, including the verification processes used in its collection, whether the data is universal or targeted at particular groups and how frequently it had been updated.¹⁹

34. The EMB stated that issues had been raised by electoral administrators relating to the quality of local data available to identify new electors. Some administrators, they note, stated that they “do not have access to sufficiently robust secondary datasets to enable them to identify unregistered electors”.

35. The challenges experienced in its pilot were highlighted to us by Powys County Council:

¹⁷ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 281

¹⁸ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 361

¹⁹ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraphs 70-71

“There was a lot of manual intervention and work, which I think the Electoral Commission report does highlight. Data matching relies on good-quality and standardised data, none of which is what we have in local authorities. A lot of the data sets have been created for other purposes.

Data cleansing the data sets that were of use was quite time consuming, stripping out the incomplete records, ensuring that they were all of a standard good enough to take forward.”²⁰

36. The AEA noted its concerns with the quality and availability of data, stating that some councils spent up to eight weeks cleansing the data, conducting data matching and quality checks. They emphasised that the amount of time needed to manually cleanse the data before data matching and doing so in a short timeframe was the biggest risk. They added that the reliance on manual systems posed an element of risk for error.

37. The Electoral Commission’s evaluation recommended that the Welsh Government “ensure there is appropriate guidance on data quality and usage” when rolling out AVR. They told us that they had been able to publish guidance based on the Regulations as drafted, in anticipation of the national rollout of AVR.

38. We also heard of challenges experienced by some registration officers in getting access to data, including the time it can take to achieve that. The AEA noted limitations which “prevent EROs receiving data electronically” and a lack of an automated process for cleansing and data matching. As a result, the AEA stated that EROs will continue to be “limited to manual data matching and/or unable to access sufficient data sources” without changes to regulations in Wales. They told us that “it’s a shame that Welsh Government haven’t carried out those things first to allow greater access to those data sources to take away some of those barriers that currently exist”.²¹

39. The Electoral Commission told us that the Welsh Government is providing EROs with data impact assessments and template data sharing agreements that they can use to help get in data from the local data holding departments, which should be “really helpful in getting some consistency”²².

²⁰ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraphs 93-94

²¹ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 102

²² Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 64

40. The EMB told us that it would be writing to all returning officers and local authority chief executives to emphasise the importance of electoral teams being able to access data sets from other local authority departments.²³

41. We heard from a Welsh Government official that:

“the Cabinet Minister recently wrote to registered social landlords, to universities and to local authorities just to make sure that they are aware of this, and that data sharing will be really helpful in terms of the accuracy and completeness of the register. We're also sharing with local authority colleagues a sample data sharing template, data sharing agreement templates or data protection impact assessments.”²⁴

42. In relation to accessing other data sources beyond those held locally, Welsh Government officials explained:

“the Elections and Elected Bodies (Wales) Act 2024, which allows automatic registration, doesn't allow regulations to be made in relation to national insurance numbers, for example, to data held by UK authorities. ...At the moment, the regulations relate to local data sources, because that's what is within the powers of the overarching Act.”

“It's not so much that we can't use national data sets per se, if they have them for other reasons, lawfully, locally, but you can't be getting other people to check them for you.”²⁵

Notification period to ‘opt-out’

43. The Regulations as drafted propose reducing the notification period within which an individual can ‘opt-out’ of automatic registration from 60 days to 28 days. The Electoral Commission recommended that the Welsh Government consider a “reduction in the notification period from 60 days”, noting that a “shorter period would offer more flexibility around the timing of an automatic registration exercise”.

²³ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 148

²⁴ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 321

²⁵ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraphs 335-336

44. When the Elections and Elected Bodies (Wales) Bill was introduced, the legislation originally proposed a 45-day notice period to allow the elector to request to be registered anonymously, or ask to not be included on the register at all. The Bill was amended during its passage through the Senedd to increase the notice period to 60 days with the aim of provide more time for vulnerable people to respond. The Welsh Government at the time stated that, though it believed 45 days to be appropriate, it was willing to accept the increase as the waiting period would be evaluated following the pilots.

45. The EM to the Regulations states that the reduction “offers more flexibility around the timing of an automatic registration exercise and less opportunity for elector confusion about whether they are registered to vote or not – particularly in the event of by-elections”. This is a view supported by the AEA “particularly in the event of devolved by-elections”. The Electoral Commission told us the main benefit of reducing the notification period is that it offers “greater flexibility for EROs in relation to the timing of that automatic registration exercise” to better align with the wider electoral calendar, adding that it also “lessened risk of elector confusion about whether they’re registered to vote or not”.²⁶

46. Some stakeholders also told us that a longer notification period could be a barrier to delivering AVR in time for the 2027 election, with the Electoral Commission noting that it would make “an already challenging timescale” for implementation “even more challenging”²⁷ while the AEA said:

“if this is to be rolled out before the local government elections next year, you have to have a 28-day period. You’ve run out of time to have a 60-day period without it impacting detrimentally on the delivery of the local government elections next year.”²⁸

47. One Voice Wales argued that a shorter notification period “encourages swifter action from voters while still protecting their rights”, reduces administrative lag and supports timely preparation ahead of elections. This was supported by Powys County Council who referred to experience of the pilot:

“Anyone who wanted to explore or needed to consider anonymous registration all rang us within the first two weeks of receiving that communication. Any parents who felt strongly that their child should

²⁶ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph

²⁷ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraphs 23-25

²⁸ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 110

not be on the register at that age rang and wanted to opt them out at that point.”²⁹

48. Despite being generally supportive of a shorter notification period, some stakeholders also acknowledged potential drawbacks, including the Electoral Commission who accepted that it allowed less time for a person who wanted to opt-out of being register to receive a letter and take action or if a letter was delivered to a previous address.³⁰ One Voice Wales noted that a 28-day window may be “challenging for individuals with limited digital access, low literacy, or unstable living circumstances”. The WLGA acknowledged that despite the potential operational efficiencies a 28-day period may provide, a shorter opt-out period could bring risks for on vulnerable people. It stated that for some groups in particular, such as victims of domestic or coercive abuse or individuals with disabilities or communication needs, “may not receive or understand or act upon notifications in time.”

49. [Welsh Women’s Aid](#) explained that many survivors of abuse may wish to ensure that their details are left anonymous for “reasons such as: safety, wanting to keep their information private and feelings of anxiety around shared information”. They emphasised the importance of ensuring that “every opportunity is offered to survivors to ensure that their details are not unintentionally shared on a public electoral register”, adding that:

“Many individuals have access to these registers, including campaigners, elected representatives and political parties. Like anyone, these individuals are not immune to being perpetrators themselves or being manipulated into sharing information.”

50. Welsh Women’s Aid stressed that survivors will need to fully understand the process and to keep their details anonymous, saying that the “longer the time-frame provided to survivors, the more chance they will have in accessing this information and being able to complete the necessary process.”

51. The Cabinet Minister in her letter to the Committee noted that “no formal consultation with stakeholder organisations representing vulnerable groups has taken place specifically on these regulations”. [Women’s Equality Network](#) (“WEN”) Wales noted its disappointment that “given what is at stake in getting this wrong”, “no consultation with specialist services supporting survivors of VAWDASV has taken place in drafting these regulations”. They added that it is

²⁹ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 115

³⁰ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 29

“unclear to us to what extent, if any, the evaluation of the pilots has explored this point and explored how risks can be mitigated”.

52. The Electoral Commission referred to the abolition of the open register for devolved elections in Wales as a potential mitigation to the concerns raised on safety, explaining:

“That’s the change that the Welsh Government will be bringing in from October, as part of the preparation and the groundwork for these regulations. That’s something we’ve welcomed and previously recommended, and it will mean that, for people who are added to the register via any process now for the devolved version in Wales, businesses et cetera won’t be able to purchase a copy of that open register.”³¹

53. Additionally, some stakeholders felt that clear communication would be crucial in providing protection for vulnerable people. One Voice Wales noted that the shorter period is workable “if accompanied by strengthened safeguards”, including clear communication, multi-channel notifications, and prominent signposting to anonymous registration routes. The AEA, Powys County Council and the EMB all emphasised the importance of this.

54. A Welsh Government official explained that a 28-day period was “more in line with other processes for responding” and that the pilots had demonstrated that “most people responded in the first two to three weeks of receiving the letter if they were going to opt out”. The official said that the Welsh Government was “fairly confident that 28 days seems appropriate”.³²

55. The Minister acknowledged the concern raised in relation to survivors of abuse being recognised by being on the register and pointed to anonymous registration, adding that she was “really eager now to push information out regarding that ability”. The Minister emphasised that the correspondence issued by electoral teams will “point out that you can have this anonymity through the new system”.³³

56. We heard from the Minister that “taking care of vulnerable groups” is a priority for the Welsh Government and that they “will continue to engage with them”, adding:

³¹ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 29

³² Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 300

³³ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 272

“There will be a process of learning within this. As things are rolling out, there will be opportunities to tighten up some parts of it as well.”³⁴

57. In response to concerns that the delivery of notifications letters could potentially be delayed, the Minister explained:

“This kind of posting around the AVR would be managed through different contractual and operational routes than the normal post, which has the ability to plan production periods and advance sending and distribution. A lot of work goes into that contract. It's not going to get rid of the risk completely, but I hope that answers your points. It's not going to be part of the general post; it will be a specific contract for those specific letters.”³⁵

Cost of automatic registration

58. The Electoral Commission's evaluation report found that the data matching process can be “time consuming and labour intensive” with significant manual work required after the automatic matching. It also noted that there are costs associated with the volume of Invitation to Register forms (ITRs) that were sent to individuals who could not be confidently data matched. Whilst the pilots were undertaken in local authorities in different parts of Wales, the evaluation stated that the experience of the pilots “will not necessarily be representative of all local authorities in Wales”.

59. The Welsh Government originally estimated that the total estimated cost of AVR implementation across Wales in year one would be approximately £2.6 million. The EM states that the pilot costs were used to inform these estimates alongside stakeholder input through the AVR Working Group, which includes local authority representatives. An updated Regulatory Impact Assessment published as part of a revised EM on 29 September, estimates that year one costs of £4.4 million. The Minister told us that “the main changes reflect a clearer operational model”, explaining that:

“They include local authority delivery costs of about £1.581 million, and upgrading costs for EMS, the software system, of about £2.82 million, providing an estimated total of £4.4 million for the work.”³⁶

³⁴ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 317

³⁵ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 305

³⁶ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 290

60. A Welsh Government official went on to explain:

“The first RIA that we published was based on expenditure relating to the pilots, and then, on further commercial conversations with the software providers, we had to revise what those costs were going to be because more information was available to us from the software providers on the different work they needed to do following the pilots.”³⁷

61. The EM states that:

“Beyond the first-year costs, the exact cost of AVR is uncertain but is expected to gradually decrease as the accuracy of the register improves year on year. This increased accuracy will mean that fewer notification letters and subsequent ITRs are required to be sent from year 2 onwards.”

62. The Electoral Commission highlighted that the successful delivery of any electoral registration process relies on the functionality of EMS systems, stating that “development will be needed for those EMS providers not involved in these pilots”.

63. One Voice Wales suggested that costs could rise “where data quality is inconsistent, where opt-out or anonymous registration rates are high, or where significant cybersecurity or system-integration upgrades are required”. It added that authorities “undergoing digital transformation” may face higher initial costs.

64. The EMB said that costs could increase significantly “where local authorities need to undertake extensive manual data matching or cleansing and/or where data is held in formats that are difficult to use”. It added that a lack of time for detailed planning before implementation and the quality of software available could impact on costs.

65. The AEA did not believe the original cost estimates have “accurately represented the burden placed on EROs and their teams”, and that costings do not provide clarity around ITRs and subsequent processes EROs will be required to carry out to maintain the accuracy of the register. They called for additional funding to enable EROs to undertake every stage of AVR, and questioned

³⁷ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 293

whether costs would decrease over time in the way anticipated by the Welsh Government.

66. Local authorities also raised concern about the costs and delivery implications of a national roll-out, which the WLGA state is “not yet fully understood”. Funding, it noted, “represents the most significant issue for local government in relation to these Regulations”. It also stated that the pilots would not have captured the “full range of local circumstances”, and therefore any unanticipated costs should fall on the Welsh Government.

67. The EMB told us:

“I think the real importance with funding is it's not one-off funding and that that funding is put into budgets and ring-fenced for this activity on an ongoing basis. I think what we've seen so far is a response from the Welsh Government to support one-off related costs up to the 2027 election, but I think the real risk is that that isn't ongoing.”³⁸

68. The AEA also emphasised the importance ongoing funding:

“it's knowing what challenges may arise out of things and then the ongoing funding. As I said, it's not just delivery here, it's what software development needs to continue to develop—we feel like what's being delivered this time is probably a minimum viable product. But it's looking at how you advance the way that you move from manual verification processes of data, how to continue to expand on those to bring capacity to electoral services teams.”³⁹

69. Powys County Council emphasised the need for funding to be ringfenced in order to ensure electoral teams can retain staff in future years:

“it is a concern that's been raised by my colleagues: that we will recruit new staff to do this process, but if the funding dries up after March or that our local councils don't prioritise it because it's not ring-fenced to us, those staff will leave and so will those skills, that knowledge, and this will be a recurring process where we will lose that skill set. it will take an awful lot of time to get them recruited, to get them trained up and skilled and knowledgeable about the process, and hopefully support us into the local elections next year,

³⁸ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 182

³⁹ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 183

and we'll potentially lose them if we can't get that funding based in the teams.”⁴⁰

70. A Welsh Government official explained that recurring costs will be the ones that fall to local authorities and set out the funding arrangements:

“in the first year, we've done that as a specific grant because it's a one-off new process that's being met. The new way of registering people through automatic registration will be a new statutory duty, so they'll need to meet that through funding that we're allocating through the RSG in future years.”⁴¹

71. Costs for the Electoral Commission will be funded through the Welsh Consolidated Fund.

Future evaluation of AVR

72. The evidence received suggested that a formal review of a national roll-out of AVR should occur soon after the first full electoral cycle. There is no provision in the regulations for such a review to take place, however the Electoral Commission told us they will be running their “usual post-poll evaluation” following the 2027 election and “intend for AVR to be a very significant portion of that reporting process”.⁴²

73. The Electoral Commission stated that “ongoing monitoring and evaluation” of AVR’s implementation will be “critical in ensuring that the process can continue to be refined and improved in the future for the benefit of voters and electoral administrators”.

74. The EMB suggested that a formal review of AVR “could provide essential assurance to the Senedd, to Ministers, EROs, administrators and voters”. The AEA also supported such a review, and added that the implementation and impact of AVR should be reviewed over several years.

75. The WLGA suggested that a review should assess “actual costs incurred” by authorities, as well as administrative impact, data accuracy and unintended consequences from implementation.

⁴⁰ Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 189

⁴¹ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 294

⁴² Local Government, Housing and Planning Committee 17 September 2026, RoP, paragraph 35

76. One Voice Wales similarly stated that a review “within 12-18 months” would be appropriate, to help identify “variations in digital capacity, data quality, and operational pressures across local authorities, ensuring the system develops consistently and equitably”.

77. ERS Cymru suggested that the Electoral Commission could undertake any such review, a view supported by the AEA, who said this should be a review by both the Electoral Commission and the Welsh Government.

78. The Minister told us that in terms of evaluation:

“it's likely that there'll be an ongoing process over the next few years, because there will be new data sets, this work will need to be done continually. It's not something that will happen just once.”⁴³

Our view

79. We note that the evidence presented to us supported the principle of introducing electoral registration without application as a means of increasing the number of registered eligible voters. We agree with that sentiment and welcome initiatives to increase democratic participation. The majority of Committee Members acknowledge that AVR is a recognised measure for facilitating this and therefore support its implementation across Wales.

80. While most Members support these Regulations and recommend their approval by the Senedd without material amendment, we believe that further work will be needed to evaluate and monitor their effectiveness and mitigate for any unintended consequences. The experience of local authorities who participated in the pilots and the evidence gathered from them are valuable, but these were only a small number and their individual experience and circumstances may not fully reflect that of all local authorities in Wales. It will be crucial to evaluate the national implementation and learn lessons to inform and shape future exercises.

81. One of our primary concerns relates to the length of time specified in the Regulations during which a person can opt-out of being automatically registered or apply for anonymous registration. The timeframe provided for this was significantly reduced in the Regulations compared to the pilots. Whilst we understand that a 28-day timeframe is beneficial for effective electoral planning and administration, this should not be to the detriment of ensuring sufficient

⁴³ Local Government, Housing and Planning Committee 1 October 2026, RoP, paragraph 358

time for people, particularly vulnerable individuals, to opt-out should they wish. Nobody should be put at risk as a result of these Regulations, therefore ensuring there are sufficient and effective safeguards is crucial.

82. We are disappointed that the Welsh Government did not undertake any formal consultation on these Regulations with stakeholder organisations representing vulnerable groups, especially as potential safety concerns were raised by our predecessor Committee during its scrutiny of the Elections and Elected Bodies (Wales) Bill. Such concerns remain, and it is vital that the Welsh Government takes urgent action to work with groups ahead of the national rollout of AVR. It will be crucial to raise awareness of and to communicate the changes, and using the expertise of relevant stakeholders will be invaluable. This should be a priority for the Welsh Government.

83. Future evaluation of AVR should specifically assess whether the 28-day timeframe is sufficient and mitigates the risks highlighted by stakeholders., It should take into consideration any instances of individuals having been put at risk or potentially at risk by being automatically registered without their knowledge.

84. We acknowledge the Cabinet Minister's assurance that correspondence relating to AVR will be distributed through a different contract compared to general postal deliveries, and whilst this alleviates some of our concerns around potential delays, we believe this should continue to be monitored.

85. We understand the Welsh Government's rationale for wanting to undertake the national rollout of AVR ahead of the local government elections scheduled for 2027, but we acknowledge that the timescales are tight. We recognise that local authority electoral teams will already be very busy in preparation for these elections and that running an AVR exercise will be an additional pressure for them. Whilst the timetable for agreeing the Regulations before the election does comply with the Gould Convention,⁴⁴ it would have been preferable to afford electoral teams more time to prepare for such a significant change. We have been reassured that teams will be able to undertake the necessary work within the time available, however the Welsh Government will need to ensure local authorities are supported in this task. This should include, where needed,

⁴⁴ The Gould Convention (also known as the Gould Principle) states that any major changes to electoral law or practice should be finalised and enacted at least six months before an election they affect.

having access to additional funds, for example to recruit staff, to fulfil the requirements.

86. We note that the Regulations provide for AVR exercises to be undertaken at least once a year. We acknowledge that more frequent exercises would likely provide for a more effective and accurate system for identifying eligible voters, however, we believe that an annual exercise strikes an appropriate balance. Conducting multiple exercises every year will increase pressure on electoral staff, particularly in the short term. However, future evaluations may identify that more regular exercises to be beneficial in the longer term.

87. We recognise and share the concerns raised in relation to the availability and quality of the local data used to identify eligible voters. Having to rely on limited data sources is clearly a weakness in the system. Whilst we appreciate the constraints in being able to access other data sources such as those held by UK Government agencies, we believe the Welsh Government should continue to pursue arrangements with the UK Government to enable such sources to be used.

88. We are also concerned that the cost of implementing AVR may be higher than anticipated as the estimate is based on the experience of the small number of local authorities who participated in the pilots. The increase of £1.8 million between the revised estimate published in September and the original estimate published upon introduction is not insignificant, and while it provides a more accurate cost estimate based on updated funding assumptions, we would be concerned if costs were to rise even further.

89. We are mindful that implementing the Regulations will require a change to the software used by electoral teams. We appreciate this will involve a change to existing software rather than new systems, however any change has the potential to be delayed or result in other unintended impacts. We are somewhat reassured to hear that Welsh Government officials are in regular communication with the providers and are monitoring progress.

90. We appreciate that these Regulations are the first to be subject to the procedure set out in section 19 of the 2024 Act, as such the process has identified some issues we believe should be taken into consideration when this procedure is used in future. When bringing forward future regulations, the Welsh Government should ensure that subordinate legislation and implementation timetables are planned with sufficient time for the full Senedd scrutiny procedure to be carried out. This is particularly important for electoral reform regulations which should be in place no later than six months before an

election they affect. In the case of these Regulations, it would not be possible to make material changes in time for the local government elections in 2027.

Recommendation 1. The majority of Committee Members recommend that the Senedd should agree the Representation of the People (Electoral Registration without Applications) (Electoral Reform) (Wales) Regulations 2026, without material amendment.

Recommendation 2. The Welsh Government should ensure that regular evaluation is undertaken following AVR exercises. We believe that regular evaluation of AVR exercises will be crucial to assess their effectiveness and learn lessons for future approaches. The first evaluation should take place within 12 months of the Regulations coming into force, accompanied by a programme for subsequent evaluations at regular intervals. Evaluations should include but not be limited to: sufficiency of the notification period to opt out; frequency of AVR exercises; the availability and quality of data; and costs.

Recommendation 3. The Welsh Government should work with groups representing vulnerable people, including those who support survivors of domestic abuse, to communicate and raise awareness of the changes ahead of the national rollout of AVR.

Recommendation 4. The Welsh Government should engage with the UK Government to explore options for allowing electoral teams to access UK sources of data.

Annex 1 – List of oral evidence sessions

The following witnesses provided oral evidence to the committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed on the Committee's [website](#).

Date	Name and Organisation
17 September 2026	Ian Bancroft, Electoral Management Board for Wales Tom Davies, The Electoral Commission Tom Hawthorn, The Electoral Commission Sandra Matthews, Powys County Council Mark Pascoe, Democracy and Boundary Commission Cymru Clare Sim, Association of Electoral Administrators
1 October 2026	Siân Gwenllïan MS, Cabinet Minister for Local Government, Housing and Planning Michael Kay, Welsh Government Ben Mincher, Welsh Government

Annex 2 – List of written evidence

The following people and organisations provided written evidence to the Committee. All written information can be viewed on the Committee's [website](#).

Reference	Organisation
Paper 4, 17 September 2026	The Electoral Commission
Paper 5, 17 September 2026	Electoral Management Board for Wales
Paper 6, 17 September 2026	Association of Electoral Administrators
Paper 7, 17 September 2026	Welsh Local Government Association
Paper 13, 17 September 2026	One Voice Wales
Paper 14, 17 September 2026	Electoral Reform Society Cymru
Paper 6, 1 October 2026	Welsh Government
Paper 14, 1 October 2026	Women's Equality Network Wales
Paper 17, 1 October 2026	Welsh Women's Aid

Additional Information

Title	Date
The Electoral Commission	1 October 2026