

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

28 September 2023

Dear Chair,

I am pleased to enclose the Electoral Commission's Annual Estimate for the 2024/25 financial year in relation to our devolved Welsh activities. Our estimate is underpinned by our five year Corporate Plan for the period 2022/23 to 2026/27 [[English](#) and [Welsh](#)]. This year's estimate is £1.658m.

As you would expect, the estimate and accompanying information sets out how we plan to manage our work effectively in Wales during 2024/25. The Corporate Plan sets out five strategic objectives for the period, which seek to maintain the high standards and public trust in the electoral system, as well as to address pressures and areas for development to further enhance the strength of democracy in Wales and the wider UK. Though the forthcoming year does not feature devolved elections, the importance of our work across our stakeholder groups continues, as the following information will illustrate.

The increase on the 2023/24 estimate is primarily driven by necessary investments to improve technology, including enhancements to cyber security, and to address issues of capacity and capability across a number of key services in the Commission. Further detail on key investment drives is provided below.

## Our proposed programme of work in 2024-25

### **Enabling voter confidence and engagement**

We will continue to work across a number of areas to promote public confidence in Wales democracy. We are continually developing and extending our provision of accurate information to voters through our website and other channels, to ensure that it provides accessible information to support them to participate in the democratic process. Between elections we work to develop new advertising based on the latest insights to drive up rates of electoral registration.

Our programme of democratic education and engagement work continues to expand the range of resources available to young people and educators across Wales. This work forms an increasingly important part of our ongoing work to increase youth engagement in democracy, raising understanding of the democratic process with the aim of effecting a steady, profound change to engagement levels.

In the next year we will build on this work, establishing a long-term youth voice programme with our new partner, Children in Wales. They will be gathering insights from a diverse group of young people from across Wales to ensure our resources meet the needs of young people in Wales. We will also continue to work with the Democracy Box to co-create content with young people. We will further develop our offer for teachers, providing training and guidance on how to effectively deliver democratic education. We will also continue to work in partnership with civil society organisations in Wales to support other under-registered groups to engage in democracy.

### **Informing the development of reforms**

We are currently supporting the Welsh Government's electoral reform agenda, providing expert advice and constructive challenge to ensure that proposals can deliver successfully for voters, administrators and campaigners. This will continue as the Senedd Cymru (Members and Elections) Bill, the Elections and Elected Bodies Bill and legislation to introduce gender quotas progress through the Senedd legislative process and new electoral legislation arises.

We will provide expert opinion on the three bills, taking into account the views of the electoral community across Wales and ensuring that any proposed changes are evidence-based, workable and deliver for voters, campaigners and electoral administrators. In addition, we will provide advice on the draft Conduct Order for the 2026 Senedd election and prepare new Codes of Practice for non-party campaigners, parties and candidates. We will also develop new guidance resources for electoral administrators and campaigners to support them to comply with any new requirements arising from the legislation.

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

### **Supporting the delivery of well-run elections**

We continue to support Returning Officers and Electoral Registration Officers to deliver high-quality services to voters. This includes the provision of advice and guidance, regular engagement meetings with ROs and EROs and by monitoring their performance against our published standards. We will assist and support the introduction of a statutory Electoral Management Board in Wales and use this new forum to help Returning Officers and Electoral Registration Officers to deliver a consistent, high-quality service for voters and those standing for election.

We will continue to use our other established networks, including the Senedd Parties Panel, to understand how we can best support political parties and candidates to help them deal with the challenges they face. We will also work closely with electoral administrators through the Wales Electoral Practitioners Working Group and Association of Electoral Administrators, Wales to ensure their views and needs are fully reflected in

our work. This includes managing the increasing complexities of the divergence between the rules for reserved and devolved elections.

We will also look at the suggestion of working with relevant Members to establish a Cross-Party Group on Democracy within the Senedd, providing a forum for Members and stakeholders to discuss issues relating to Welsh democracy.

### **Engaging regulatory and wider stakeholders**

We will continue to build on our work in supporting the regulated community in Wales including developing bespoke advice and guidance and resources so that parties and campaigners can easily understand the political finance laws, regardless of their size or experience. We have expanded the range of support available and continue to provide transparency for the public on political finance in Wales by publishing the details of donations, loans and annual party accounts. We monitor compliance with political finance law and will take proportionate enforcement action where necessary.

Finally, we will continue to work with other statutory bodies and our established networks to understand how we can best support our wider stakeholders and the challenges they face. We will also continue to inform MSs about our work, including the provision of drop-in sessions in the Senedd, briefings on areas of work which MSs have expressed an interest in and tailored seminars.

### **Value for money**

The Commission is committed to ensuring efficient and effective use of funding. To achieve this, we focus on several key areas of work, including procurement, contract management, performance management, and effective prioritisation.

Proposed budgets for the Commission as previously set out in the Corporate Plan have been updated to reflect inflationary pressures affecting the UK. The Commission's ability to demonstrate value for money hinges on its ability to optimise procurement practices, manage contracts efficiently, manage risks, monitor and improve performance, and make informed decisions about resource allocation through effective prioritisation.

The Commission will seek to ensure that we are not only fulfilling our objectives but also doing so in a cost-effective and efficient manner, ultimately driving gains in public value.

With regard to the proposed bid for funding, the same funding formula has been applied as that in the previous year, to support the equitable division of costs between the three parliaments. The Commission's core costs for shared activity – such as the ongoing support to voters, administrators and the regulated community, as well as the corporate costs necessary for the operation of the Commission – are allocated on a formula based on population estimates. The allocation to Wales is typically 8%. Where there is an additional demand on Commission functions to meet needs specific to Welsh stakeholders, or where the activity is solely attributable to Welsh devolved functions, these are allocated between 5% and 100%.

Despite high inflation for the past 18 months, including a level of 6.8% CPI (Consumer Price Index) in July 2023, we will continue to seek to mitigate inflation wherever possible in our non-pay commercial costs.

## Key investment drivers

We can confirm that the Senedd Cymru's proposed contribution will be an increase of £244,000 compared with the funding for period 2023/24. This is largely made up from investment in the following areas:

### **Cyber security**

The discovery of a sophisticated cyber-attack on the Commission has underlined the need to keep pace with the latest cyber security technology. The UK's democratic process and its institutions remain a target for hostile actors online. Cyber security enhancements continue into 2024/25, and form a significant part of the increased investment we are seeking. The proportion of these costs in relation to the Wales budget are £73,000.

### **Delivering value for money and building a skilled and diverse workforce**

To deliver value for money we will be investing in procurement staffing to drive improved standards in commercial transactions and develop our internal financial budgeting and monitoring functions. This includes expanding our internal audit services and absorbing increased fees from our external auditors, the National Audit Office, following increased testing during the 2022/23 closure of accounts.

We will also be investing in our human resources functions to improve data collection and monitoring on equality, diversity and inclusion to inform our recruitment and staff retention processes. We will also strengthen the learning and development opportunities for our workforce.

The costs related to these investments, as attributable to Wales, are £65,000.

### **Delivering electoral reform**

Given the introduction of the electoral reform bills in Wales, we are investing in increased capacity across our Wales, policy, legal, research and regulation functions. This will ensure we can provide expert advice to Government, Parliament, and the regulated community to manage the impact of increasing divergence between the rules for Wales devolved elections and reserved elections. The total costs attributable to Wales for this investment are £51,000.

## Pay award

Assumptions for the pay award in 2024/25 and inflation reflected in contracts are at £74,000, based on the assumption of a 5% increase being agreed.

The above is offset in part by changes in total value of assets charged to the 2024/25 year of a reduction of £19,000.

As in the previous year, the Welsh Government can request advice and assistance from the Commission on specific electoral related matters. This would be in addition to the funding provided by the Senedd.

## Measuring performance

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

Our corporate performance indicators sit alongside a group which show the health of the electoral systems as a whole. These enable a 'health check' to help guide actions by ourselves and others. Working with these others – including elected members, government, campaigners, and parties, through to electoral administrators and the police, we make key contributions that enable a sound democratic system.

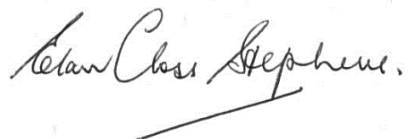
Please refer to Annex A for details of indicators that were proposed in 2022/23 (the latest end of year figures available), and the values achieved at the end of the year. These values show we met the majority of the targets set at the beginning of the year, with details of reasons for the four corporate performance indicators that missed their targets. Annex B shows our proposal for ways to measure our performance in 2024/25.

I hope you agree that our programme of work for 2024-25 is appropriate to address the size and nature of the challenges at hand and will ultimately result in greater public confidence in our electoral system. We will measure the impact of our planned activities throughout 2024-25 to ensure they address the challenges outlined above.

A new UK Parliamentary Corporate Plan is expected to be in place following the general election that will take place before January 2025, and this plan will be considered as is appropriate as we work towards the development of the Welsh Corporate Plan which will be brought to the Llywydd's Committee for consideration after the 2026 Senedd elections.

We commend the enclosed estimate for the financial year 2024/25 to the Committee and look forward to discussing it with you when appropriate.

Yours sincerely,

Handwritten signature of Dame Elan Closs Stephens in black ink.

**Dame Elan Closs Stephens CBE**  
Electoral Commissioner - Wales

Handwritten signature of Shaun McNally in black ink.

**Shaun McNally CBE**  
Chief Executive and Accounting Officer,  
Electoral Commission

# Annex A: Measuring our 2022/23 performance

## Our corporate performance indicators

Number	Definition	Corporate performance target	End of 2022/23 values
<b>Strategic objective 1: Accessible registration and voting</b>			
1	Public awareness campaign influence on voter registration: Additions to electoral registers during our voter registration campaigns meet or exceed our targets (May 2022 polls)	Wales: 36,716 (379,810 - UK)	Wales: 22,678 <sup>1</sup> (280,498 – UK)
2	Engagement with local authorities and partners who disseminate voter information to specific target groups, including those newly enfranchised groups	To be developed in 2022/23 (year 1)	18 roll-call editions to our local authority communications stakeholders
3	Engagement with partners and young people to develop democratic education resources for young people in-line with our Learning Strategy	To be developed in 2022/23	Engagement made and resources developed
<b>Strategic objective 2: Transparent political campaigning and compliant political finance</b>			
4	Timely publication of donation and loan reports received by statutory deadline	100%	100%
5	Timely publication of statements of accounts	100%	5.02% <sup>2</sup>
6	Timely progression and conclusion of investigations	90%	91.18%

<sup>1</sup> There are a number of factors that could have negatively impacted this PI, some of which were external and some relate to the campaign including target setting itself. Notably, there was a reduction in campaign spend ahead of these elections and in the early awareness-raising phase. Since the polls, we have reviewed all data to ensure ongoing efficacy of our advertising, and our target-setting processes, to take these insights into account in planning future campaigns.

<sup>2</sup> There are different deadlines by which parties with income and expenditure under and over £250,000 need to submit their annual statement of accounts to the Commission. Owing to internal resource constraints, a decision was taken in 2022 to combine publication of the two tranches. This meant postponing the publication of a large number of statements until after the reporting deadline for the larger parties. 100% of statements were published on the agreed publication date.

<b>Number</b>	<b>Definition</b>	<b>Corporate performance target</b>	<b>End of 2022/23 values</b>
7	Timely notification / issuance of decisions on sanctions (final notices) following representations period	90%	100%
8	Timely notification of outcome of party and non-party campaigner registration applications (for new and change of details)	90%	81.91%
9	Timely responses to requests for regulatory advice on financial reporting	90%	99.17%
10	Effective regulatory guidance products / resources delivered to support compliance with the law	Already collecting data, to be baselined in 2021/22	59
11	Guidance product related queries that help identify existing and/or new areas of the guidance that provide additional clarity with the law	Already collecting data, to be baselined in 2021/22	100%
<b>Strategic objective 3: Resilient local electoral services</b>			
12	Accurate and timely advice to Returning Officers, Electoral Registration Officers and candidates & agents (Great Britain)	100%	99.35%
13	Publication of accurate and timely guidance products for electoral administrators	100%	100%
<b>Strategic objective 4: Fair and effective electoral law</b>			
14	Timely publication of election / referendum reports	100%	100%
15	Timely publication of pilots evaluation report	100%	100% (1 publication - The analysis of the Welsh early voting pilots)
16	Timely responses to policy proposals and legislative consultations	100%	100%
17	Timely responses to elected stakeholder (MS and local government) correspondence	100%	97.83%
<b>Strategic objective 5: A modern and sustainable electoral system</b>			
18	Engagement with our website by the public, campaigners and parties, electoral administrators and the media	To be developed in 2022/23 (year 1)	N/A (website still being developed)



<b>Number</b>	<b>Definition</b>	<b>Corporate performance target</b>	<b>End of 2022/23 values</b>
19	Frequency of engagement with other regulatory bodies	To be developed in 2022/23 (year 1)	N/A (Measurement method still being developed)
20	Meeting requirements of existing and emerging or new environmental legislation	To be developed in 2022/23 (year 1)	N/A (To be developed when the Welsh Government's target is published)
<b>Strategic objective 6: We demonstrate independence and integrity</b>			
21	Timely responses to both English and Welsh language social media enquiries	100% within one working day	100%
22	Timely responses to both English and Welsh language public enquiries via calls, letters and emails	100%	99.69%
23	Timely responses to both English and Welsh language valid Subject Access Requests	100%	100%
24	Timely responses to both English and Welsh language valid Freedom of Information requests	90%	97.7%
<b>Strategic objective 7: We are a skilled organisation where diversity is valued</b>			
25	Maintained staff wellbeing score in staff survey	77%	77%
26	Maintained staff engagement score in staff survey	67%	66%
27	Maintained completeness of workforce diversity information	85%	90.86%
28	Maintained compliance with the Welsh Language Standards set by the Welsh Language Commissioner	100%	100%
<b>Strategic objective 8: We are a learning organisation where improvement is continuous and resources are used effectively</b>			
29	Public value framework: Cost of delivering our services per tax payer per year stays within an agreed baseline	80 pence	39pence

<b>Number</b>	<b>Definition</b>	<b>Corporate performance target</b>	<b>End of 2022/23 values</b>
30	Timely implementation of internal audit recommendations agreed by the Risk and Audit Committee	90%	76.67% <sup>3</sup>
31	Qualification of our financial statements in the Annual Report and Accounts	Unqualified audit opinion	No
32	Quality management: percentage of processes documented and reviewed for continuous improvement	To be developed in 2022/23 (year 1)	N/A (Development discontinued)
33	Timely implementation of external audit recommendations agreed by the Executive Team	100%	75% <sup>4</sup>
34	Prompt payment of undisputed and valid invoices	100%	100%
35	Reduced environmental impact of energy consumption	To be developed in 2022/23 (year 1)	N/A (To be developed when the Welsh Government's target is published)

## Indicators for the health of the electoral systems

<b>Ref</b>	<b>Definition</b>	<b>System target</b>	<b>End of 2022/23 values</b>
1	Confidence in voting	95%	91%
2	Confidence in registering to vote	95%	89%
3	Votes rejected and not included in the count for elections	As close to 0% as possible	1.27%
4	Satisfaction with the process of voting	85%	79%
5	Satisfaction with the system of registering to vote	85%	79%

<sup>3</sup>Seven out of 30 internal audit recommendations were not implemented on time mainly due to staff capacity and availability.

<sup>4</sup> One out of four external audit recommendations were not implemented on time. The outstanding audit recommendation relates to considering the scope for sharing experiences and learning from counterparts in other countries. A Four Countries conference is currently being planned. We will take any insights from this to apply to our work where relevant. Given this an annual PI, it will not change until updated data is available from March 2024.

<b>Ref</b>	<b>Definition</b>	<b>System target</b>	<b>End of 2022/23 values</b>
6	Perception that process of voting is easy	95%	82%
7	Reduced barriers to voting by groups that are traditionally under-registered including newly enfranchised groups	To be developed in 2022/23 (year 1)	N/A (Development discontinued)
8	Reduced barriers to registration by groups that are traditionally under-registered including newly enfranchised groups	To be developed in 2022/23 (year 1)	N/A (Development discontinued)
9	Perception that appropriate action will be taken by the authorities if a political party or a campaigner is caught breaking the law on campaign funding	75%	30%
10	Agreement or perception that the spending and funding of political parties, candidates and other campaigning organisations is open and transparent	75%	13%
11	Number of cases of alleged electoral fraud relating to political finance offences, reported to UK police forces each calendar year (including number of cases that result in conviction or caution)	To be developed in 2022/23 (years 1)	N/A (Development discontinued)
12	Level of compliance by individuals and entities we regulate with deadlines set by legislation	100%	98.29%
13	Confidence in the trustworthiness of campaigning	To be developed in 2022/23 (year 1)	N/A (Development discontinued)
14	Confidence that elections are well run	80%	73%
15	Perception that voting in general is safe from fraud and abuse	90%	81%
16	Levels of accuracy of the electoral registers	95%	86%
17	Levels of completeness of the electoral registers	95%	83%
18	Number of formal Electoral Registration Officer and Returning Officer performance assessments determining standards have not been met	0	0
19	Number of pieces of electoral legislation not in place six months before required to be implemented	0	5

<b>Ref</b>	<b>Definition</b>	<b>System target</b>	<b>End of 2022/23 values</b>
20	Prompt responses by relevant governments to our election, referendum and other policy recommendation reports, including pilot evaluations.	100%	0

# Annex B: Measuring our 2024/25 performance

## Our corporate performance indicators

Number	Definition	Corporate performance target
<b>Strategic objective 1: Accessible registration and voting</b>		
1	Public awareness campaign influence on voter registration: Additions to electoral registers during our voter registration campaigns meet or exceed our targets	Target will be set by end of January 2024
2	Engagement with local authorities and partners who disseminate voter information to specific target groups, including those newly enfranchised groups	N/A (number of engagements will be reported annually)
3	Engagement with partners and young people to deliver democratic education resources for young people in-line with our Learning Strategy	To be developed in 2023/24
<b>Strategic objective 2: Transparent political campaigning and compliant political finance</b>		
4	Timely publication of donation and loan reports received by statutory deadline	100%
5	Timely publication of statements of accounts	100%
6	Timely final decisions on cases being investigated, and notification of outcome.	90%
7	Timely notification / issuance of decisions on sanctions (final notices) following representations period	90%
8	Timely notification of outcome of party and non-party campaigner registration applications (for new and change of details)	90%
9	Timely responses to requests for regulatory advice on financial reporting	90%
10	Effective regulatory guidance products / resources delivered to support compliance with the law	Depends on guidance required for elections in 2024/25

<b>Number</b>	<b>Definition</b>	<b>Corporate performance target</b>
11	Guidance product related queries that help identify existing and/or new areas of the guidance that provide additional clarity with the law	100%
<b>Strategic objective 3: Resilient local electoral services</b>		
12	Accurate and timely advice to Returning Officers, Electoral Registration Officers and candidates & agents (Great Britain)	100%
13	Publication of accurate and timely guidance products for electoral administrators	100%
<b>Strategic objective 4: Fair and effective electoral law</b>		
14	Timely publication of election / referendum reports	100%
15	Timely publication of pilots evaluation report	100%
16	Timely responses to policy proposals and legislative consultations	100%
<b>Strategic objective 5: A modern and sustainable electoral system</b>		
17	Meeting requirements of existing and emerging or new environmental legislation	To be developed when Government's targets are published
<b>Strategic objective 6: We demonstrate independence and integrity</b>		
18	Timely responses to elected stakeholder (MS and local government) correspondence	100%
19	Timely responses to both English and Welsh language social media enquiries	100% within one working day
20	Timely responses to both English and Welsh language public enquiries via calls, letters and emails	100%
21	Timely responses to both English and Welsh language valid Subject Access Requests	100%
22	Timely responses to both English and Welsh language valid Freedom of Information requests	90%
<b>Strategic objective 7: We are a skilled organisation where diversity is valued</b>		
23	Maintained staff wellbeing score in staff survey	77%
24	Maintained staff engagement score in staff survey	67%

25	Maintained completeness of workforce diversity information	85%
26	Maintained compliance with the Welsh Language Standards set by the Welsh Language Commissioner	100%
<b>Strategic objective 8: We are a learning organisation where improvement is continuous, and resources are used effectively</b>		
27	Public value framework: Cost of delivering our services per taxpayer per year stays within an agreed baseline	80 pence
28	Timely implementation of internal audit recommendations agreed by the Risk and Audit Committee	90%
29	Qualification of our financial statements in the Annual Report and Accounts	No (Unqualified audit opinion)
30	Timely implementation of external audit recommendations agreed by the Executive Team	100%
31	Prompt payment of undisputed and valid invoices	100%
32	Reduced environmental impact of energy consumption	To be developed when Government's targets are published

## Indicators for the health of the electoral systems

Number	Definition	System target
1	Confidence in voting	95%
2	Confidence in registering to vote	95%
3	Votes rejected and not included in the count for elections	As close to 0% as possible
4	Satisfaction with the process of voting	85%
5	Satisfaction with the system of registering to vote	85%
6	Perception that process of voting is easy	95%
7	Perception that appropriate action will be taken by the authorities if a political party or a campaigner is caught breaking the law on campaign funding	75%
8	Agreement or perception that the spending and funding of political parties, candidates and other campaigning organisations is open and transparent	75%

Number	Definition	System target
9	Number of cases of alleged electoral fraud relating to political finance offences, reported to UK police forces each calendar year (including number of cases that result in conviction or caution)	N/A (number of cases will be reported annually)
10	Level of compliance by individuals and entities we regulate with deadlines set by legislation	100%
11	Confidence in the trustworthiness of campaigning	N/A
12	Confidence that elections are well run	80%
13	Perception that voting in general is safe from fraud and abuse	90%
14	Levels of accuracy of the electoral registers	95%
15	Levels of completeness of the electoral registers	95%
16	Number of formal Electoral Registration Officer and Returning Officer performance assessments determining standards have not been met	0
17	Number of pieces of electoral legislation not in place six months before required to be implemented	0
18	Prompt responses by relevant governments to our election, referendum and other policy recommendation reports, including pilot evaluations.	100%