

# WELSH GOVERNMENT INTEGRATED IMPACT ASSESSMENT

<b>Title of proposal:</b>	<b>Representation of the People (Electoral Registration without Applications) (Electoral Reform) (Wales) Regulations 2026</b>
<b>Official(s) completing the Integrated Impact Assessment (name(s) and name of team):</b>	<b>Emily Griffiths &amp; Lauren Morrison Elections Division</b>
<b>Department:</b>	<b>Local Government</b>
<b>Head of Division/SRO (name):</b>	<b>Michael Kay, Deputy Director, Elections Division</b>
<b>Cabinet Secretary/Minister responsible:</b>	<b>Siân Gwenllïan, Cabinet Minister for Local Government, Housing and Planning</b>
<b>Start Date:</b>	<b>April 2026</b>

## SECTION 1. WHAT ACTION IS THE WELSH GOVERNMENT CONSIDERING AND WHY?

The Representation of the People (Electoral Registration without Applications) (Electoral Reform) (Wales) Regulations 2026 provides for all local authorities in Wales to conduct electoral registration without application, also known as automatic voter registration (AVR) in relation to the local government electoral register in Wales and the steps for doing so.

This involves using locally available data to identify electors that are not currently on the local government electoral register and adding them to the register provided an Electoral Registration Officer (ERO) is satisfied that they are eligible. These Regulations seek to help to remove barriers to electoral registration for local elections and Senedd elections in Wales by making it an automatic process. This should improve the accuracy and completeness of the electoral register in Wales and encourage participation in elections by those not currently registered to vote. Pilots were carried out by four local authorities in Wales in 2025, which suggested that AVR could be rolled out in Wales and could have a positive impact on the completeness of the electoral registers.<sup>1</sup>

### **1.1. Well-being of Future Generations (Wales) Act**

AVR reflects the five ways of working by taking a long-term, preventative, collaborative approach to improving democratic participation, these have been considered throughout the development of this work and are discussed in more detail below. AVR will integrate into existing local authority (LA) practices to address under-registration on local government electoral registers and ensure that there is an all-Wales, sustainable approach to improving democratic participation.

### **1.2. Long term**

The long-term benefits of the regulations include improved accuracy and numbers on the local government electoral register, which is an important step towards improving democratic health in Wales.

### **1.3. Prevention**

AVR will help tackle under-registration and disenfranchisement, by adding electors to the local government electoral register automatically, using trusted data sources to improve the completeness and accuracy of the registers and support democratic participation. It would also help prevent instances where people turn out to vote but had not proactively registered for a devolved election.

### **1.4. Integration**

AVR will integrate into existing LA practices by working alongside existing registration processes and using data which is already accessible by LAs to provide better outcomes, therefore, improving overall registration rates.

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<sup>1</sup> [Automatic registration pilots evaluation | Electoral Commission](#)

## **1.5. Collaboration**

Welsh Government officials have worked closely with the Electoral Commission, the Association of Electoral Administrators (AEA) and colleagues across local authorities in developing these regulations and the pilots which preceded them. A working group was established for the pilot authorities, the Electoral Commission and the AEA which, following the pilots, reconvened as an AVR Implementation working group and was expanded to all local authorities across Wales to participate in the further development of AVR. Officials are also working closely with Electoral Management Systems (EMS) providers to prepare software systems for the necessary changes to be able to implement AVR. Officials are also liaising with UK Government on the Representation of the People Bill 2026, which sets out to improve voter registration for UK Parliamentary elections.

## **1.6. Involvement**

Whilst the Welsh Government has not consulted directly with the electorate on AVR as a singular topic, in 2022 it consulted on AVR as part of a wider Electoral Administration and Reform White Paper. As part of the consultation process ten engagement events were held with key stakeholders, including Returning Officers, electoral service managers, and the Democracy and Boundary Commission Cymru. The Welsh Government received a total of 137 responses to the consultation. There were four questions relating to AVR and the topics were also presented in easy read and youth friendly formats. The majority of the responses to the questions were supportive of AVR and highlighted the need to keep vulnerable electors anonymous and ensure that data held by local authorities is safeguarded.

Four local authorities in Wales took part in the pilots – Carmarthenshire, Gwynedd, Newport and Powys. Three pilots added just over 14,500 new electors to the registers, which represented 2 – 8% of the register in each local authority area.

Those electors registered by AVR through the pilots were issued a notification letter and could opt out of the process if they so wished. Notification letters provided information to electors on the pilot and how they could contact the LA if they had any concerns. A very small number of electors contacted the LAs, and their feedback and concerns were fed into the Electoral Commission evaluation and have informed the further development of these regulations from the pilot stage. Following receipt of the notification letters, only 198 electors in total contacted the three pilot LAs to opt out of the process.

## **1.7. Impact**

The three pilot authorities who sought to automatically register voters added over 14,500 new electors to the registers. An additional 1,500 attainments were also registered in two of these LAs. The Office for National Statistics estimates that in

each Gwynedd and Powys there are approximately 2,700 / 2,800 people aged 14 – 15 years. The electors added to the local government register in the pilots therefore represent between 16 and 37% of all potential attainers in those areas.

From the evidence available, the majority of the additions to the register appear accurate, only a small proportion were removed during the subsequent annual canvass. Therefore, AVR pilots had a significant positive impact on ensuring the accuracy and completeness of the local government register in Wales, which is a duty of all EROs. It also helped to improve access to democracy for eligible but unregistered electors by placing them on the register. It is expected that the full roll out of AVR provided for in these regulations would see that positive impact expanded across all Welsh LAs. The Electoral Commission’s evaluation report found that the pilots had a positive impact on the local government register and that it should be implemented across Wales.

The Electoral Commission’s evaluation report also made recommendations to mitigate any negative or unintended impacts that may arise from AVR, and these have been taken into account by Welsh Government in developing these regulations.

The regulations will support electoral reform and are part of a wider package of measures that aims to improve the democracy of Wales, and this is an overall positive impact.

### **1.8. Costs and Savings**

Costs and savings associated with these regulations are set out in in the draft Regulatory Impact Assessment (“RIA”) published alongside the regulations.

### **1.9. Mechanism**

These regulations are being made under the Senedd approval procedure in accordance with section 18 of the Elections and Elected Bodies (Wales) Act 2024.

## **SECTION 8. CONCLUSION**

### **8.1 How have people most likely to be affected by the proposal been involved in developing it?**

When developing the Elections and Elected Bodies (Wales) Act 2024 and the specific AVR pilots the Welsh Government engaged with local authorities, the Electoral Commission and the AEA in the development of the policy and the legislation.

In three of the four pilot LAs electors had the opportunity to contact their council and express their views on AVR if they were contacted as an eligible elector being automatically registered. A small number did contact the local authorities to opt-out of the process and their feedback was incorporated into the evaluation of the pilot, which has informed these regulations.

Cyngor Gwynedd also worked with an external agency on an outreach programme through civil society groups to engage communities about voter registration. 17 civil society organisations fed into the project, 14 actively participated in community engagement, which included 1:1 support in drop-in sessions, materials distribution during activities and digital communications.

### **8.2 What are the most significant impacts, positive and negative?**

There will be a significant impact in terms of resources for LAs with additional capacity needed to manage electors who decide to opt out of AVR and those requiring follow up communication in the form of an Invitation to Register (ITR) for the UK Parliamentary electoral franchise. There will also be follow up ITR communication and processing required where an eligible elector can only be identified by one data set as part of the AVR data matching process. The AVR process requires electors to be matched by two data sets to be automatically registered (unless there is a match with education data). Where only one data match can be made, but the ERO is aware of the elector, the ERO is still required to send an ITR.

There may also be an impact of increased confusion for some electors as to which elections they can vote in due to the different franchises for reserved and devolved elections. The notification letters sent by EROs to electors identified under AVR should help to mitigate any confusion. This is a common issue that EROs are used to explaining to electors.

The main positive impact is that electoral registers will be more accurate and complete as a result of AVR, helping EROs to fulfil their statutory duty of maintaining the electoral register. The regulations will also help to reduce the democratic deficit in Wales by automatically registering eligible electors not yet on the local government register, removing barriers and enabling them to participate in Welsh democracy.

### **8.3 In light of the impacts identified, how will the proposal:**

- **maximise contribution to our well-being objectives and the seven well-being goals; and/or,**
- **avoid, reduce or mitigate any negative impacts?**

There is clear alignment between the regulations and the five ways of working in the Future Generations Act. The most prominent is collaboration, AVR requires joint working between Welsh Government, EROs and key stakeholders such as the Electoral Commission and between EROs and colleagues across the LA, in education and housing. There is a clear cross-sector working approach to implementing AVR and improving electoral registration.

In developing our proposals, we have given full consideration to the seven well-being goals. AVR aligns with multiple well-being goals, particularly a more equal Wales, by improving access to democratic participation.

We will continue to work with stakeholders to identify potential negative impacts and agree actions to mitigate impacts. EROs will be provided with Electoral Commission guidance to help them fulfil their new duties in respect of AVR and funding and support will be provided by Welsh Government to enable them to resource their new function.

Communications to electors will be designed to reduce any confusion around voting eligibility, the different franchises and how to register anonymously.

### **8.4 How will the impact of the proposal be monitored and evaluated as it progresses and when it concludes?**

The impact of AVR on the electoral register will be monitored through the electoral management systems providing data on the numbers registered automatically. The Electoral Commission also reports regularly on registration practices in Wales.