

SENEDD ELECTORAL REFORM DELIVERY BOARD – RISK REGISTER (MAY 2026)

	Inherent risk score				Residual risk				
Risk Description	I	L	Overall	Mitigation	I	L	Overall	Latest position/Comments	Owner & Next Review Date
Legislation									
If the coming into force of any primary or secondary legislation is delayed then there will be an impact on the time available to implement and take account of changes, creating significant uncertainty, for the 2026 election.	5	4	20	Legislation timetables closely monitored. Regular review of milestones undertaken through governance arrangements for Senedd electoral reforms. Engagement with key delivery partners to continue. For Senedd pairing exercise some flexibility was built into the proposals as the deadline for reporting (31 March 2025) was over a year ahead of the election date, so there was scope for a delay but still remaining within Gould principle deadline (September 2025). Electoral administrators also indicated that they would be content to work from the proposals in the final report of the DBCC given that they are to be implemented without need for Senedd approval. Reporting date for the review in advance of the 2030 election now set at “before 1st December 2028”, increasing the time	5	1	5	Senedd Cymru (Members and Elections) Act received Royal Assent on 24 June 2024. Elections and Elected Bodies (Wales) Act received Royal Assent on 9 September 2024. Senedd agreed on 24 September 2024 to the withdrawal of the Senedd Cymru (Electoral Candidate Lists) Bill. DBCC published final boundaries and Regulations were laid on 19 June 2025, having been made on 16 June. Expenses order was approved by the Senedd on 1 July 2025 and made on 3 July. Conduct Order was approved by the Senedd on 8 July 2025 and came	Will Whiteley / Michael Kay RISK CLOSED MAY 2026

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				available for legislative and practical implementation.				into force on 18 July. Disqualification order came into force in November 2025. OAVA prepared for implementation late 2026, on basis of legislation timing and EC/Administrators concerns (taken forward in step with Scotland). Charges Order and Accounts Order made on Monday 9 March 2026, and came into force on 17 March.	
Communication									
If there is insufficient communication between the Welsh Government and delivery partners on risks/issues/progress then implementation challenges could arise and pose a threat to 2026 delivery.	5	4	20	Engagement via existing mechanisms (e.g. EMB, Ministerial attendance at events etc). Senedd Electoral Reform Delivery Board including external partners also provides formal mechanism for discussion of issues.	4	1	4	Delivery Board established March 2023 with positive feedback from members and willingness to engage. Meetings taking place on bi-monthly basis.	SERDB RISK CLOSED MAY 2026
If there is insufficient or otherwise deficient communication between key bodies and the electorate (including attainers), then understanding of the	5	4	20	Welsh Government officials engaging in a communications group led by the Senedd Commission, and which includes the Electoral Commission, DBCC and Local	5	2	10	Senedd Commission led Comms Group involved Electoral Commission, Local Authority, EMB and DBCC. Single comms grid in	Will Whiteley/ Michael Kay

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changes by voters could have a negative impact on engagement/turnout.				Authority/EMB representation to provide reassurance that there will be a programme of work to raise voter and candidate awareness about the electoral changes.				place and operated as a live document.	RISK CLOSED MAY 2026
Resources, Capacity and Training									
If sufficient experience and expertise isn't in place, through mutual support as well as appropriate guidance and training for those tasked with implementing the reforms, then inconsistencies in approach may arise resulting in a risk to 2026 delivery	4	4	16	EMB established and taking forward activity to support this area. Early and regular engagement with stakeholders to assist with their planning and provide opportunities for raising and discussing issues at an early stage. Potential to explore mentoring/buddying for new Returning Officers through EMB.	4	3	12	EMB encouraged constituency returning officers to have early conversations about sharing staff; provision of tools and templates to assist cross boundary working. All CROs were signposted to the AEA update training and attendance was high. The EMB ran two workshops to ensure a consistent understanding of the reforms and associated key risks/issues. The EMB issued four 'practice notes' for CROs, covering accessibility, bilingual delivery, ballot paper design and communicating local totals at the count, in February. An additional note covering the declaration of results was issued to encourage consistency. In addition,	SERDB RISK CLOSED MAY 2026

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								the Board continued to signpost other resources to CROs. SERDB retains an interest but not lead responsibility.	
If the changes to the Electoral Management Software cannot be fully implemented successfully in sufficient time ahead of the 2026 election then this may pose a threat to delivery of the 2026 election.	5	4	20	Early and ongoing engagement with suppliers on range of forthcoming changes (Senedd Reform and Electoral Reform).	5	2	10	EMS Specification implemented by the companies . UKG managing EMS relations on OAVA, first tranche of work has been completed and delivered on schedule. No delays expected for second and final tranche, well ahead of late 2026 transition. The changes to the software had direct consequences for the delivery of the Wales Electoral Information Platform. This was discussed with WG and a set of actions agreed. The EMB ensured a contingency plan was in place in the event that the EMS providers did not make the changes in time for go live.	Will Whiteley/Michael Kay RISK CLOSED MAY 2026

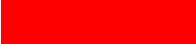
	Risk Description	Inherent risk score			Mitigation	Residual risk			Latest position/Comments	Owner & Next Review Date
		I	L	Overall		I	L	Overall		
	If print suppliers and postal services do not provide a reliable service then smooth operation of the election will be jeopardised.	4	3	12	EMB has identified risks relating to capacity and capability of universal mail provider and printers and has mitigation activity in place.	4	2	8	EMB participation in UKG mail provider group, dialogue with provider and engagement with constituency returning officers. Royal Mail provided an update to the EMB's February meeting and expressed no concerns for the election, reporting that they had plans in place. The EMB maintained contact with Royal Mail through officials. Print requirements featured in workshops and briefings to CROs and their teams. The EMB conducted an assurance exercise with ROs in February and March to offer or facilitate additional if necessary. Issue arose with supplementary run of postal votes in Cardiff with mitigating action taken. Will be considered as part of routine post-election review activity.	SERDB RISK CLOSED MAY 2026

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								SERDB retains an interest but not lead responsibility.	
If the divergence between reserved and devolved elections is not clearly communicated and understood then this could have a negative impact on the successful running of the 2026 election, and lead to potential confusion by the electorate about their participation in different elections.	4	4	16	Preparation and delivery of communications plans to provide opportunity for clarifying areas of difference between elections.	4	2	8		SERDB RISK CLOSED MAY 2026
External Factors									
If there were to be a change in the date of the Senedd election due to external factors (e.g. date of UK General Election) then ability to deliver could be impacted.	4	3	12	Contingency planning to be undertaken using varying commencement dates. Commencement provisions accommodate the exercise of the Llywydd's power to vary the date of the Senedd election by 1 month, and WG wider stakeholder engagement factors in the possibility of a change in the date.	3	2	6	No change in date required.	Michael Kay RISK CLOSED MAY 2026
If there is insufficient preparedness within political parties for new requirements (e.g. candidate eligibility, party lists) then successful implementation of the 2026 election will be undermined.	5	4	20	Ongoing engagement with political parties via Electoral Commission's Senedd Political Parties Panel to raise awareness of forthcoming changes, as well as cascade via wider communications plans.	4	2	8	EC's revised guidance for political parties published in September 2025.	Will Whiteley/ Electoral Commission RISK CLOSED MAY 2026

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	If there is significant harassment, intimidation or misbehaviour in the conduct of the elections, its legitimacy may be undermined and people discouraged from participation.	4	4	16	The Electoral Commission are working with the College of Policing to strengthen the SPoC arrangements and encourage better police engagement. WG are flagging the risk to UKG and working with internal National Security and Resilience colleagues on appropriate preparations as well as working with Ofcom to look to strengthen relationships with tech platforms to tackle online hate and misinformation. EMB engagement with Chief Constables, police elections lead officers and with constituency returning officers.	3	3	9	EMB work including discussion with police and at EMB autumn workshops, with ACC Belcher (Gold Command, SW Police and national lead) attending the EMB. Command structures were stood up. UK Government candidate guidance issued via EC , including applicability of Op Ford to Senedd candidates.	Michael Kay/Electoral Commission/ Electoral Management Board RISK CLOSED MAY 2026

Risk Scoring Matrix

LIKELIHOOD	Probable	5	10	15	20	25
	Likely	4	8	12	16	20
	Possible	3	6	9	12	15
	Unlikely	2	4	6	8	10
	Rare	1	2	3	4	5
		Negligible	Minor	Moderate	Major	Critical
IMPACT						

Level	Colour	Score Range
Low		1 – 4
Moderate		5 – 12
High		13 – 19
Very High		20 – 25

Risks removed from Register

		Inherent risk score				Residual risk				
	Risk Description	I	L	Overall	Mitigation	I	L	Overall	Latest position/Comments	Date removed
	If Electoral Administrators and Returning Officers are insufficiently resourced then their ability to implement changes in required timeframe could be negatively impacted.	4	4	16	Early and regular engagement with stakeholders to assist with their planning and provide opportunities for raising and discussing issues at early stage and allow consideration as part of wider WG budgetary discussions. Explore mentoring/buddying for new ROs through WECB/EMB.	4	3	12	Merged with capability and capacity risk	January 2025
	If the impact of wider electoral reform is not sufficiently considered then resources and capacity to deliver could be impacted.	4	4	16	Close working between WG Senedd Reform and Electoral Reform teams and between WG and key partners to continue in order that issues are considered at early opportunity.	3	3	9	WG engaged in Nations Review Group consideration of reserved changes, noting that no further changes will be made for 2026. Risk closed as in implementation rather than innovation mode.	March 2025
	If the changes required to the Conduct Order are not made, and in good time, or the Order is subject to challenge, then the ability to hold the election will be compromised.	5	4	20	Work undertaken to identify changes required and good engagement within Welsh Government (Senedd Reform Division, Elections Division and Legal Services) and with partners. Public consultation commenced in late November 2024 following statutory	5	2	10	Conduct Order came into force on 18th July.	November 2025

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					consultation with Electoral Commission. Consultation closed 17 February 2025.					