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Welsh Government

Consultation – summary of responses

Election campaign expenditure limits for political parties at Senedd elections

February 2025

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

Overview

This document provides a summary of the responses received by the Welsh Government to our consultation:

- [Election campaign expenditure limits for political parties at Senedd elections.](#)

The consultation was published on 6 September 2024 and closed on 1 November 2024. It received 13 responses from a range of stakeholders and interested parties.

A Welsh Government response is also offered for each question. These provide the Welsh Government's initial view on the collective responses to that consultation question. As further work will be undertaken, this represents an interim view.

Action Required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: <https://www.gov.wales/election-campaign-expenditure-limits-for-political-parties-at-senedd-elections>

Contents

Introduction	4
Engagement and the consultation	5
Summary of Responses	6
Next steps	14

Introduction

The Welsh Government undertook a consultation between 6 September 2024 and 1 November 2024 on proposals for election campaign expenditure limits for political parties at Senedd elections.

The Senedd Cymru (Members and Elections) Act 2024 (“SCME Act”) will change the electoral system under which Senedd elections are held for all elections from April 2026 (the next Senedd election is scheduled for 7 May 2026).

The current electoral system (“the additional member system”) provided for in the Government of Wales Act 2006 uses the additional member system, which means each elector has two votes: one vote in one constituency election, held under the first-past-the-post electoral system, and one vote in one regional election, held under a closed list system which is a form of proportional representation. Parties may submit lists with a maximum of 12 candidates for each region they contest. There are 40 constituencies returning one member each and five regions returning four members each. Allocation of the regional seats takes into account the number of constituency seats each party has won across that region.

The SCME Act will change the Senedd electoral system to an entirely proportional one where all members are elected on the same basis via closed lists (“the new system”). Parties may submit lists with a maximum of eight candidates in each constituency they contest. Each elector gets one vote in one constituency election. There will be 16 constituencies each returning six Members.

	Previous additional Member system	The new proportional system
Constituencies	40	16
Members per constituency	1	6
Party list maximum size	1	8
Regions	5	0
Members per region	4	-
Party list maximum size	12	-
Total Member returned	60	96

Election expenses are expenses incurred in support of a registered political party or candidate during the regulated period immediately leading up to an election. Such expenses are governed by rules, including in relation to who can incur such expenditure, on what it can be spent, detailed reporting rules and limits on how much can be spent during that period. The spending limits the consultation asked about relate to the expenditure those parties or candidates have raised themselves and do not relate to public money.

Election expense limits under the additional member system differ between constituency and regional elections. Separate limits exist for candidates standing for a party in constituencies, parties standing candidates in constituencies, and parties standing lists in regions. The change in electoral system, where candidates only stand on a party list and where there are no regions, means these separate limits will no longer make sense.

Section 21 of the SCME Act gives the Welsh Ministers a power to make regulations “to set the limits applying to campaign expenditure incurred by or on behalf of a registered party that contests one or more constituencies at a general election”.

Party election expenses are regulated by the Political Parties Elections and Referendums Act 2000 (“PPERA”). The regulations the Welsh Ministers may make to set limits on campaign expenditure will amend that Act. The regulations can only be made with the consent of the Electoral Commission.

Engagement and the consultation

Views were invited as part of an eight-week consultation period which began on 6 September 2024 and closed on 1 November 2024. The consultation was published on the Welsh Government’s website. Respondents were able to submit their views and comments on paper, by email or online, and in Welsh or English.

In addition, Officials held a technical briefing to which all registered political parties in Wales were invited, of which representatives from two parties attended. One additional registered party requested a technical briefing from officials separately, which was provided. Officials also attended two sessions of the Senedd Political Parties Panel to provide a technical briefing about the consultation, representatives from the four parties represented in the Senedd attended these sessions. All these sessions were arranged by the Electoral Commission who also attended. As these were technical briefings, no responses were received as part of the sessions, with all responses submitted electronically.

Summary of Responses

This document is intended as a summary of the responses received. It does not aim to capture every point raised by respondents.

A Welsh Government response is also offered for each question. These provide the Welsh Government's initial view on the collective responses to that consultation question. As further work will be undertaken, this represents an interim view.

There were 13 responses in total to the consultation. The respondent type is broken down as follows:

Individuals:	7 (8 responses)
Registered political parties and other organisations:	4 responded to the questions, 1 provided a general response

Non-specific responses

Four individuals (across five responses) offered a general response rather than responses to each individual question. These responses favoured the reduction or removal of any public funds to parties or for expense limits to be set at £0. As the responses are not question-specific, they are considered generally and not in relation to any specific question below.

One of the organisational responses focused on the issue of joint candidates and the impact of their removal on the spending limits of parties who do not stand non-joint candidates. As this does not relate to the specific questions in this consultation, they are not considered as part of the conclusions herein.

Welsh Government response

The Welsh Government notes the responses and the desire of some to reduce expenditure. It is important to note that this consultation deals with election expenditure limits for registered political parties spending money they have raised themselves and does not relate to any public money. For parties spending their own money, we believe it is an important part of the democratic process for them to be able to effectively communicate with electors and that campaigning comes with unavoidable costs for the parties. A reduction in spending limits to zero would undermine democracy in Wales and deprive constituents of the knowledge they need to make an informed decision at a Senedd election.

The current consultation on remaking the National Assembly for Wales (Representation of the People) Order 2007 ("the Conduct Order") will offer an opportunity for stakeholders and the public to comment on a broader array of issues relating to the way Senedd elections are run.

Question 1. What are your thoughts on the suitability of the proposed approach to adapt aggregate, maximum campaign limits to work with the new electoral system? How, if at all, would you change the proposed approach?

Summary of responses

One individual disagreed with the suggested approach and wanted a £120,000 limit per constituency (£20,000 per candidate up to six). One agreed with the approach. And one agreed with the general approach but disagreed with the use of the aggregate candidate limits as part of the limit for the new closed-list system.

Three of the organisations supported the general approach or did not have any specific issues with it. One disagreed with the approach reasoning that fewer constituencies would mean lower costs, and therefore that the overall limit should reduce under the new system in order to maintain parties' current ability to campaign.

One organisation also suggested that evidence be collected from the 2026 election to inform a broader review thereafter.

Welsh Government response

The Welsh Government notes the responses and welcomes the support for the general approach, while being mindful that there is some support for reducing the overall limit, which will be dealt with in a later question.

We also note the suggestion to review expenditure limits for registered political parties as part of the proposed post-election review by a committee of the Senedd, the content of which will be a decision for the Members of the seventh Senedd.

Question 2. How, if at all, should expense limits vary between constituencies?

Summary of responses

Two individuals supported consistency between constituencies, and one suggested that there may be a case for variation if there are significant geographic differences between constituencies.

Two organisations supported a consistent limit between constituencies. One supported a small variation between county and borough constituencies to reflect higher costs outside of urban areas. One organisation wanted to add a per-electoral element to the proposed limits that would also vary based on how rural a constituency is – it felt that this should be based on the two tiers currently used plus an additional third tier (“large county”).

Welsh Government response

The Welsh Government agrees with the responses which felt a consistent limit between constituencies would be simpler. However, it is important to note that the proposed overall expenditure limits set out in the consultation document included all the existing spending limits, including variations between borough and county constituencies. Since any limits will be treated as part of a single national limit under the proposals, and parties will be free to apportion that limit as they wish, there would be no practical difference to having variety between constituencies for any party standing in all constituencies.

For those only standing in one constituency, or a small number of constituencies, it may make a marginal difference, but it is not considered to be large given that constituency electorates for 2026 will be within a narrow margin (+/- 10%) and will be kept within narrow margins (+/- 10%) in future boundary reviews, ensuring there is no great range of populations.

Finally, under the Westminster system there are only four borough constituencies, and the proposals from the Democracy and Boundary Commission Cymru for constituency pairings for the 2026 Senedd election designate them all as county constituencies, with no borough constituencies. This would, depending on the final decisions, further reduce the impact of any differentiation.

Question 3. What are your thoughts on the suitability of the 3 approaches outlined regarding maximum national party limits?

Summary of responses

One individual was happy with all the options, but didn't provide a preference. Another indicated that NL3 (£1,147,493) was their preference of the three, but that a better approach may be to simply increase the party limits by 10-20% and not include the candidate limits. And a third that the limits should be reduced, suggesting elsewhere that they should be £20,000 per candidate up to £120,000 per constituency.

One organisation supported NL1 (£600,000), one NL2 (£947,493) and one NL3. The final organisation suggested that NL3 may be the most straightforward if the intention is to maintain current limits and that they would view the other options as a more significant change from the current arrangements.

One of the organisations suggested there should be an allowance for general party spending not related to any party list.

Another highlighted that the maximum UK general election limits for Wales were far higher, at £1.7m, and suggested that the Welsh Government should review the limits

following the 2026 election to ensure they take into account any increased costs of campaigning.

Welsh Government response

The Welsh Government welcomes the responses and acknowledges that there is no consensus on this question. Unless other questions indicate reasons otherwise, it is therefore the government's preferred option to seek the option most simply identified with current aggregate limits for a registered political party at a Senedd election.

Though there are different understandings of that, the maximum, total, overall current limit (NL3) is therefore preferred as the most straightforward application of the principle of maintaining current overall limits.

Question 4. With reference to the 2 options provided, how do you think the number of candidates on a party list should be considered when calculating expense limits?

Summary of responses

Three individuals supported taking into account the number of candidates stood on a party list in calculating limits associated with standing in a constituency (option 2), with one arguing that this is consistent with the principle established under the current system.

Two organisations favoured option 1 (no per-candidate element) and two favoured option 2 (a per-candidate element).

There were directly opposing views on which option was fairer, on whether contesting more seats (and therefore more votes) increased campaign costs or not, and which option would result in a greater likelihood of parties standing paper candidates in order to increase their spending limit.

Welsh Government response

This is the question where the range of views is widest, and there is no clear consensus on a preferred approach. Though there was more support for a per-candidate element to a party's limit, we acknowledge that valid arguments are made for both options.

That such a range of opinions on such a fundamental element of the system (and others in this consultation) have been expressed may add weight to the suggestion for a more fundamental review of expense limits after the 2026 election, as suggested in one of the responses. As referenced in an earlier response, any such review would be a question for the seventh Senedd to consider as part of the proposed post-election review.

That would still require a model to be established for the upcoming election, and we are therefore giving the proposals further consideration. This will be informed by a desire to replicate the current combined regional and constituency system as closely as possible, as well as seeking to reduce the risk of paper candidates – defined as candidates stood by a party in one constituency with the principle aim of boosting that party’s spending limit in another constituency.

Question 5. If the limit does increase with the number of candidates on a party list, do you think that this should reach its maximum for a list of six, to match the number of seats available?

Summary of responses

Four individuals answered that the maximum should be reached at six candidates.

The two organisations opposed to per-candidate limits preferred, if there were to be one, a per-candidate cap nearer to four or five candidates. The two organisations who preferred to have a per-candidate element supported a cap at six candidates.

Welsh Government response

Focussing on the number of candidates to which any per-candidate element should be limited, we do not support an approach which seeks to estimate or assume the likely maximum number of seats any one party might gain in a constituency as that is a matter for the voters. We therefore accept the view of the majority of responses, and all the responses from those who support a per-candidate element, that if there is to be such a cap it should be at six candidates. This offers a simpler justification, being linked to the number of seats being contested, and therefore to the underlying rationale of porting across a per-seat element to expense limits.

Question 6. In addition to a per-candidate element, how, if at all, should a ‘fixed’, per-constituency element be applied to a party’s campaign expense limit?

Summary of responses

One individual supported the proposals in the consultation. Another suggested a £20,000 per candidate limit, and therefore no ‘fixed’ element at all. The final individual suggested a 22% fixed element and (6x) 13% per-candidate element.

One organisation felt the fixed element should be 100% of the limit. Another that the per-candidate element should be 100% of the limit, and so the fixed element 0%. One agreed with the illustration in the consultation for a £12,500 fixed element and a £4,200 per-candidate. The final organisation felt that if there were a per-candidate element there would need to also be a fixed element.

Welsh Government response

As this is the mirror question to the one on a per-candidate element, it is unsurprising that the responses are equally split with no consensus on the preferred option; responses ranged from the fixed element being 100% of the limit to 0% of the limit. Further work is therefore required to develop the final position.

Question 7. Should the initial fixed ‘per constituency’ element be greater than the additional ‘per candidate’ element of the party’s limit?

Summary of responses

One individual felt there shouldn’t be a fixed element to avoid complexity. Another that the fixed element should not be greater than the per-candidate element. And the final individual that the fixed element should be greater.

One organisation did not agree with having a per-candidate element but felt that if there was one it should be less than 10% in total (that is, 10% total for a list of six over a list of one). Another felt there should be no fixed element. A third that the fixed element should be higher than the per-candidate element. And the final organisation that the fixed element would need to be much greater than the per-candidate element – to the extent that a list of one should have the vast majority of the maximum limit.

Welsh Government response

As with previous questions on the per-candidate and per-constituency elements of any limit, the views expressed cover the full possible range of options and demonstrate that there is no consensus.

Further work is therefore required to find a compromise position ahead of the 2026 election.

Question 8. What changes, if any, would you make to this approach to Option 2 with regard to per-constituency allocations, per-candidate allocations, and maximum limit totals?

Summary of responses

One individual stated a preference to reduce the size of the fixed element to help reduce the risk of unduly advantaging parties with fewer candidates, and that the overall limit should be considered for reduction too. Another sought a reduced amount overall, and only a per-constituency limit. A third individual agreed with the proposals as stated.

Three organisations responded to this question. One rejected the whole approach on the view that costs would be lower with fewer constituencies. However, if the approach suggested were to be taken, they felt that the difference between a list of

one and of six should be far smaller – representing only a 10% increase (for a list of 6 over a list of 1).

Another supported the suggested NL3 approach, but with the fixed element removed, providing an overall maximum total of about £700,000 for a party standing only one candidate in each constituency.

The final organisation preferred to have only a fixed element (no per-candidate) suggesting that having both wouldn't offer a level playing field but felt that if there were a per-candidate element, it should be far smaller compared to the fixed element.

Welsh Government response

As this question builds on the previous ones, and so the responses reflect the previous strong differences in opinions. This reinforces the need for further work to seek to bridge these differences.

Question 9: What, in your opinion, would be the likely effects of the proposals on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Summary of responses

Of those who responded to this question, none felt that there would be any impact on the Welsh language.

Welsh Government response

The Welsh Government agrees that the proposals are expected to have no impact on the Welsh language.

Question 10: In your opinion, could the proposal be formulated or changed so as to have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English, or mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Summary of responses

Of those who responded to this question, none felt that there would be any impact on the Welsh language.

One of the organisations suggested that the proposal could state [the already existing position] that translation costs are not treated as part of a Party's official spend.

Another organisation suggested that the use of Welsh in the 2026 election should be monitored and reviewed to identify further legislative opportunities.

Welsh Government response

The Welsh Government supports the use of Welsh in Senedd elections and notes that the proposed review of the electoral changes following the 2026 election could be a useful vehicle for assessing the impact of changes on the Welsh language.

Question 11. Please provide any additional comments you have in relation to Senedd election expense limits for political parties.

Summary of responses

One individual responded that gifts should not be permitted in relation to election expenses. Another that they hoped the proposals would support smaller parties. And the final individual that limits should be reviewed every three years and adjusted for inflation to avoid large increases.

The organisations added comments on: personal expense limits, and a desire to have them increased; expense allowances for disabled candidates facing higher costs; and a need to clarify what, if any, impact the proposals will have on non-party campaigners.

Welsh Government response

Some of the issues raised do not relate to the issues being consulted on but may be of relevance to the forthcoming consultation on updating the Conduct Order.

Next steps

All the responses to this consultation have been analysed, considered and have helped the Welsh Government further develop proposals relating to Senedd election expense limits for registered parties.

This will also inform some elements of the consultation on the updated Conduct Order due to the fact that independent candidate expense limits are dealt with in that.

Work will now be done to produce a set of regulations, including accompanying documentation, for introduction to the Senedd.

As the consent of the Electoral Commission is required in the exercise of the section 21 powers, draft regulations and documentation will be shared with the Electoral Commission in advance of being laid before the Senedd.

Summary of responses

Responses were received from:

- An individual wishing to remain anonymous
- An individual wishing to remain anonymous
- An individual wishing to remain anonymous
- An individual wishing to remain anonymous (two responses)
- Eifion M Jones
- Electoral Commission Wales
- No name provided
- Plaid Cymru
- Professor Justin Fisher
- The Co-operative Party
- Wales Green Party
- Welsh Labour