

Senedd Cymru
Y Pwyllgor Safonau Ymddygiad
[Atebolrwydd Aelodau Unigol o'r Senedd - Rhoddion](#)

D03

Ymateb gan: Electoral Reform Society Cymru

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Welsh Parliament
Standards of Conduct Committee
[Individual Member Accountability - Donations](#)

D03

Evidence from: Electoral Reform Society Cymru

Written evidence: Inquiry into Individual Member Accountability – Donations

ERS Cymru

July 2025

Awareness

The Committee considers a key part of transparency and trust is ensuring that the right information is available.

We would be keen to know:

- ***Whether you would know how to access the information on what donations Politicians have received? If so, which sources do you use?***
- ***Whether you think that information is sufficient about donations and what information you would expect to be available about donations?***

Transparency is a fundamental principle of political finance regulation. Appropriate transparency measures can ensure that voters are aware of who is funding campaigns and that regulators have the tools to ensure that political finance rules are being met. Transparency is also fundamental to deterring corruption.

The UK Electoral Commission political finance database is considered world leading in the accessibility and breadth information available.¹ Donations and loans (that meet the thresholds for disclosure) are searchable for parties and for candidates.

For Senedd elections, spending returns and total donations received are reported, for parties and candidates, in a searchable format online. Having both publicly available information and online searchability is considered best practice for transparency. However, details of donations below the national disclosure threshold are not reported and full individual candidate spending returns are only available to the public on request from the Returning Officer.

The thresholds for reporting donations to the Electoral Commission have increased in recent years. Now only donations to candidates over £2,230 from a single source need to be registered with the Electoral Commission, and only donations over £11,180 to parties. These limits (even before the increase) are, by international standards, quite high, meaning many donors and donations do not meet the threshold for transparency. The average threshold for donation disclosure across EU Member states is 2,400 Euros. There is a strong argument that the UK threshold is, particularly after the increase, set too high.

However, the type of information available and accessibility of the data remains a strong part of the UK's political finance regime. One area that hinders transparency in donations and spending is the length of time between an election and the publications of returns. Spending returns for parties spending over £250,000 in the 2021 Senedd election were not reported until February of the following year. The Committee on Standards in Public Life has previously recommended reducing these timescales so that the information is available in a timely way.² Many countries

¹ International IDEA (2022) Regulating the Business of Election Campaigns: Financial transparency in the influence ecosystem in the United Kingdom, <https://www.idea.int/publications/catalogue/regulating-business-election-campaigns>

² CSPL (2021) Regulating Electoral Finance https://assets.publishing.service.gov.uk/media/60e460b1d3bf7f56801f3bf6/CSPL_Regulating_Election_Finance_Review_Final_Web.pdf

have moved to reporting either in real time or much more directly, and advances in technology allow for streamlining this process without additional administrative burden, improving transparency for voters.

Value of Donations

At present there is a monetary threshold for registration of a donation having been received, but there is no limit on the amount of money that can be donated.

We would be keen to know:

- **How much discretion do you think politicians should have in the amount of money they accept?**
- **Do you think there should be a limit on the amount donated for specific campaigns by, and if so, what should this limit be from: a) individuals; b) companies; c) charities; d) other organisations; or e) for the entire campaign**

Rules around donations typically seek to ensure that there is a 'level playing field' for electoral participants so the electorate is enabled to vote for their preferred candidates and policies. They may also seek to prevent distortion caused by foreign interference and ensure that those with the deepest pockets are not able to have an undue influence over campaigns, to safeguard against corruption and maintain a fair contest. This is essential for public trust in the system.

Whilst there are limits on spending, there are currently no limits on donations. This creates a space for individual, corporate or other interests to have an outsized impact on the financial flows to parties and candidates. Both the total amount of political donations and the size of donations has been increasing. Transparency International found that in 2023, £56.5 million of the total £85 million of reported contributions from private sources that year came from just nineteen donors. In addition, TI found that since 2001, almost 1 in every 10 pounds of reported donations has come from either unknown or questionable sources.³ Whether it's parties or candidates, reliance on a small number of wealthy donations can distort politics and open up the potential for corruption. A donations limit is not only better for preventing undue influence but protects political parties and representatives from risky fundraising behaviours.

A Welsh example of controversy related to donations was the £200,000 donation to Vaughan Gething MS, at the time when he was a candidate in the Welsh Labour leadership contest. This led to significant debate within the Senedd, and ultimately, to him standing down. This is likely to have had a negative impact on public trust in the system as a whole.

Many countries place limits on donations. Canada for example has a limit of \$1,750 maximum total donations to a party by an individual in a year (the same limit applies to total donations to candidates and leadership candidates).⁴ Most Northern, Western and Southern European countries also have individual donation limits, either annual or for electoral contests, (ranging from 2,500 Euros in Ireland to 50,000 Euros in Spain).

³ Transparency International (2024) Cheques and Balances: Countering the influence of big money in politics <https://www.transparency.org.uk/publications/cheques-and-balances-counter-ing-influence-big-money-uk-politics>

⁴ This amount increases each year.

In 2011, the Committee on Standards in Public Life recommended a donation limit of £10,000 each year.⁵ This would be high by international standards but was seen as appropriate in the UK context. A lower limit might be appropriate for specific electoral contests, and it would be sensible to consider donations limits alongside spending limits as well as considering the period in which the limit is in effect (whether annual or contest related) to ensure that regulations are complimentary.

There are clear spikes in donations during electoral cycles, but it is also understood that much activity also happens outside of regulated periods and campaigning can take place all year round, every year. Restricting donations for a regulated period would not necessarily prevent larger donations being made outside of that.

Additional Accountability

The Senedd currently records information about donations on the individual Member's register of interest and the information is also published on the Electoral Commission website.

There is no other requirement on Members to record any interaction with individuals or groups.

- **Would you expect people/individuals donating to politicians to declare or register information somewhere?**
- **Do you think the various ways, other than financial ones, in which Members can benefit should be recorded (such as, use of resources/facilities/services etc..)?**
- **Do you think that the Senedd needs a method for recording interactions, other than financial ones, by any particular group of people with Members?**

Outside of donations, the main areas of concern are gifts and hospitality, the funding of foreign trips, and the funnelling of funds through third parties.

The Senedd Register of Members' Interests covers most of the categories of gifts and benefits.

Whilst foreign trips are registered, there are no restriction on the funders of those trips which leaves open the possibility of foreign states seeking influence through funded visits.

In addition, there are still gaps in the framework around Unincorporated Associations (UAs) and the source of funds that come through UAs. Similarly on corporate donations, there are currently still loopholes that allow for funds made outside the UK to be funnelled through shell companies. Knowing the name and address of the entity that makes the donation is often not enough to ensure that the donation comes from a permissible source.

The onus is typically on the candidate or party accepting the donation rather than the doner and there is a strong case for having robust know-your-donor checks to protect parties and candidates, and for entities that receive and collate donations such as Unincorporated Associations to be required to enhance their permissibility checks.

Outside of the financial rules, one clear gap in how interactions are recorded between MSs and organisations or campaigning groups is a lack of a lobbying register in Wales. At present, the

⁵ <https://www.gov.uk/government/publications/political-party-finance-ending-the-big-donor-culture>

guidance on lobbying and access to Members of the Senedd is not extensive, indicating that “members should consider” a number of steps, including taking records and notes of any meeting with those they consider to be lobbyists.⁶ The lack of mandatory record keeping, and strong guidance, risks inconsistency between members when capturing information around meetings. Given the guidance also does not require the publication of such information, there is a lack of transparency for the public who have no way of accessing information about meetings their elected members have undertaken.

As such, we would recommend that a lobbying register is introduced ahead of the seventh Senedd. This would bring the Senedd into line with the register in operation in Scotland,⁷ and at a UK level.

⁶ <https://senedd.wales/how-we-work/code-of-conduct/guidance-on-lobbying-and-access-to-members-of-the-senedd/>

⁷ <https://www.lobbying.scot/SPS?AspxAutoDetectCookieSupport=1>