

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

**D04**

**Ymateb gan: Public Affairs Cymru**

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

**D04**

**Evidence from: Public Affairs Cymru**



## **Public Affairs Cymru Membership Response to the Senedd Standards of Conduct Committee Inquiry into Individual Member Accountability – Donations**

**July 2025**

Public Affairs Cymru (PAC) is a membership organisation for public affairs professionals in Wales. Members come from a wide variety of backgrounds – commercial public affairs agencies, PR companies, the voluntary sector, trade associations, advocacy groups and professional bodies who all share a common desire to ensure that public affairs and lobbying activities are undertaken professionally and responsibly.

Public Affairs Cymru recognises that lobbying and public affairs activity is an entirely legitimate and a vital part of Welsh democracy and its members are committed to:

- Advising on professional practice in public affairs in Wales
- Raising awareness of issues within the sector, and
- Enhancing the reputation of public affairs in Wales.
- With appropriate consultation, be the collective voice of public affairs professionals in Wales.

In preparing a response to this inquiry, PAC's Executive Committee has considered the questions posed by the Committee in order to form a response.

The Senedd's Standards of Conduct Committee has set out four questions relating to Individual Member Accountability – Donations:

- the level of reporting and disclosure of donations which individual Members are required to undertake;
- whether there should be any restrictions (beyond those of the Electoral Commission) on who can donate;
- whether there should be a cap on donations from any one entity or individual; and
- whether there should be variation in the rules depending on the source of donation.

The Senedd's Register of Interests is a crucial living document to ensure that Members of the Senedd are held accountable for the donations they receive and

other relevant interests that they hold. The fact that this is openly accessible ensures that scrutiny can take place.

PAC responses to some of these questions are set out below:

### **The level of reporting and disclosure of donations which individual Members are required to undertake**

PAC's Executive feels that the level of reporting required by Members is currently appropriate, both in terms of the period of time allowed in order to make additions/changes, the level of reporting required, and the amount received either actually or in kind.

Where the figure be reduced to extremely small amounts in kind, this could place a significant burden on Members of the Senedd. An example would be MSs attending a drop-in event at the Senedd that sees a small number of Welsh cakes supplied as catering for the event. Were the threshold to be reduced to extremely small levels, even a single Welsh cake could require disclosure, potentially irrespective of whether the MS accepted or consumed the Welsh cake. This would also place additional burdens on organisations that would be required to calculate their overall catering spend and divide it by the total number of event attendees (MSs and others) in order to advise MSs of the small amount they need to disclose.

Such activities could not only be overly burdensome, but they could act as a barrier to open engagement. Such donations in kind are unlikely to be the type of donations expected to be included in the Register either by the Committee or the public.

It is however, welcome that interests that are no longer live do however remain on the Register, as this is a critical part of Member accountability. Similarly, the fact that Registers from previous Senedd terms remain accessible is again important to both scrutiny and accountability.

The requirement at present sits solely with the Member of the Senedd to update their Register. As publicly elected servants, this is appropriate.

Similarly, the PRCA holds its own Lobbying Register which requires public affairs and communications agencies to set out all organisations that they support with political engagement activity and advice.

Whilst there are expectations and rules for how Members of the Senedd should act, there are similarly codes of conduct in place for public affairs and communications professionals, such as PRCA's Public Affairs Code and the Code of Conduct, the CIPR's Code of Conduct, and the PAC Code of Conduct. These set out how public affairs and communications professionals are required to act, including in relation to payment and donations to elected representatives.

Whilst the Senedd's Standard of Conduct Committee has the powers to sanction Members of the Senedd, similarly each of the above organisations have the power to sanction their members.

**Whether there should be any restrictions (beyond those of the Electoral Commission) on who can donate;**

**Whether there should be a cap on donations from any one entity or individual; and**

**Whether there should be variation in the rules depending on the source of donation.**

It would appear appropriate for the rules and restrictions to remain the same for all types and sources of donation. Ultimately the decision on whether to accept a donation should be made by the Member of the Senedd. This decision is made with the full knowledge that their register of interests and donations will be accessible to the public.

All information should be presented in the same way and with the same amount of information, in order to ensure that Members of the Senedd are held accountable to the same levels irrespective of the type, level or source of donation that they have accepted.

**Public Affairs Cymru Executive Committee**

**July 2025**