



the union of choice for senior managers  
and professionals in public service

David Richards  
Director, Governance & Ethics  
Welsh Government  
(by email)

23 May 2025

Dear David

Ministerial Code

Thank you for the opportunity to discuss the work you have been undertaking on behalf of the First Minister on revisions to the Ministerial Code.

Please find attached the new policy that FDA adopted last week at its Annual Delegate Conference (ADC).

You will see from the document that while recognising that the First Minister must be the ultimate arbiter of a minister's fate, there is still the need for a process with minimum standards including:

- independence of decision making into complaints, including whether to investigate and ultimate factual outcome;
- transparency of process for everyone involved in a complaint; and
- clear obligations and rights for all the parties involved, including ability to challenge factual conclusions.

In providing advice to the First Minister, we urge you to consider these minimum standards and stand ready to discuss further with you or the First Minister if useful.

Kind regards

A handwritten signature in black ink, appearing to read 'Jane Runeckles', written in a cursive style.

Jane Runeckles

cc. Matthew Hall

## Annex 1

### FDA policy on Ministerial Code (May 2025)

This ADC welcomes the changes made by the new Prime Minister to the Ministerial Code, including granting the power to initiate investigations to the renamed Independent Adviser on Ministers' Conduct.

Whilst these changes are an improvement to the code, this ADC believes that they do not go far enough in establishing a truly independent process to investigate complaints of bullying and harassment were they to be made by a civil servant against a minister.

This ADC is concerned that the current system is still opaque with no written, transparent process and no rights conferred on either party when it comes to the conduct of an investigation or its conclusion.

This ADC recognises that bullying and harassment is at its core, an abuse of power, and the power imbalance between ministers, some of the most powerful people in the country, and civil servants, is vast. This ADC believes that in a modern workplace, everyone should be held to the same standards of behaviour and conduct. Critical in ensuring this is a process that all parties can have confidence in to deal with complaints when they arise. If civil servants are to have confidence in a process that will investigate the conduct of ministers, many of whom may be the closest political allies of the Prime Minister, they need to believe that the process will be free from political bias. These are not just theoretical concerns, it has been the lived experience of many civil servants in recent years.

This ADC recognises that the Prime Minister, or First Ministers, must be the ultimate arbiter of a minister's fate, but that still allows for a process with minimum standards including:

- independence of decision making into complaints, including whether to investigate and ultimate factual outcome;
- transparency of process for everyone involved in a complaint; and
- clear obligations and rights for all the parties involved, including ability to challenge factual conclusions.

This ADC welcomes the progress that has been made in Scottish Government to develop processes that meet these standards in partnership with the FDA.

This ADC calls on the Executive Committee to work with the new UK government to establish a new process for handling complaints that will provide the minimum standards expected in any modern workplace.

This ADC also calls upon the Executive Committee to ensure that those minimum standards apply in all governments, parliaments and assemblies of the UK, seeking to establish processes to deliver this where they are absent.