

Vikki Howells AS  
Chair of the Standards of Conduct Committee  
[via e-mail]

Dyddiad | Date: 23 November 2022

Pwnc | Subject: Training and Cross-Party Groups

Dear Vikki,

Further to my letter of 25 October, I write to update you regarding the two topics that you raised with me - Training on the Code of Conduct and Cross-Party Groups.

As you will know, the Political Contact Group discussed the issue of training in their meeting on 14th November. The recommendation of the Standards Committee that more training should be arranged for Members on the Code of Conduct and various related documents was accepted by the Group. Meetings have since been held with the Chiefs of Staff to discuss how best to hold such sessions, and it was decided that one session will be held for each group and we expect this to happen in early January.

You also wrote to me about the work of the Standards of Conduct Committee (the Committee) on Cross-Party Groups (CPGs), as part of your inquiry into lobbying, and I said I would write again after taking more advice on this.

The Committee has reflected, within its Rules for the operation of Cross-Party Groups, both that Cross-Party Groups are not formal Senedd groups bound by the Senedd's Standing Orders, and that they are widely recognised as a valuable part of the democratic process. Whilst they have no formal role in policy development, Cross-Party Groups provide a forum for Members of the Senedd from different parties to meet in order to consider and discuss shared interests in particular subjects. Of course, participation in such groups is a matter for each individual Member.

The Rules for the operation of Cross-Party Groups provide the parameters to which all Cross-Party Groups are subject. These include setting out the permitted use of Senedd facilities and resources, and that there will be no Senedd budget to cover running costs of CPGs other than the provisions detailed within those Rules. These factors provide the basis of the historic advice provided to Members Business Support (MBS) as to the admissibility of claims identified as costs relating to CPG meetings and activities.

As I know you are aware, the Rules and Guidance on Use of Senedd Resources went through a full consultation process before being issued earlier in the summer. The updated rules are very clear and the definition of "Member Duties" is intended to be quite wide ranging, meaning "activity in



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relation to business of the Senedd and constituency or regional business, wherever undertaken, in the public office of Member of the Senedd”.

Recognising that Members undertake their roles in a number of different ways, I am confident that this definition does not prevent claims from being made for activities which takes place outside of Plenary or committee meetings. Provided the purpose of the activity falls within what is necessary for a Member to undertake their duties, costs which fall under the Determination are recoverable.

The Remuneration Board decides on the purposes for which it provides allowances from which Members may claim, and how those are described. It is for individual Members to decide how to discharge their duties, and they are able to make claims in line with the Determination where that applies. It is my view that the current wording of the Determination is such that the fact that a particular activity may fall under the auspices of a CPG is incidental to the question of whether or not the claim can be made. It may be that the subject of the CPG is one that has particular relevance to the Member’s constituency or region, or the CPG might involve matters that are (or may legitimately be) debated by the Senedd. It is for each Member to exercise a judgement as to whether the CPG activity constitutes a necessary part of their duties, in which case a claim could be admissible.

I would be happy to share the interpretation set out above with the Remuneration Board, and in the meantime this advice will form the basis for MBS considerations as to the admissibility of claims associated with CPG meetings and activities going forward.

In the reporting of your current inquiry, the Committee may wish to make clear that the provisions set out in the Rules and Guidance on Use of Senedd Resources set out the permitted use of resources from Senedd Commission operational budgets, they do not prohibit admissible claims from being made from allowances provided in the Determination where Members are undertaking activities to deliver their duties.

Yours Sincerely,



**Manon Antoniazzi**

**Prif Weithredwr a Chlerc y Senedd / Chief Executive and Clerk of the Senedd**

Croesewir gohebiaeth yn Gymraeg neu Saesneg. We welcome correspondence in Welsh or English.

