



Vikki Howells MS  
Chair  
Standards of Conduct Committee  
Welsh Parliament  
By Email: [SeneddStandards@senedd.wales](mailto:SeneddStandards@senedd.wales)

28 June 2023

Dear Chair,

I am writing in response to your letter of 9 June regarding the Committee's inquiry into the Registration and Declaration of Interests and the current requirements on Ministers.

Parallel to the requirement on Senedd Members to record their interests with the Table Office, the Ministerial Code requires Ministers to ensure that no conflict arises, or could reasonably be perceived to arise, between their public duties and their private interests, financial or otherwise. The process outlined in the Ministerial Code for Ministers to record and seek advice from the Permanent Secretary on their private interests is well established. Ministers, in fact, regularly seek advice from the Permanent Secretary on their private interests to ensure they are scrupulous in ensuring that no conflict arises in their duties as a Minister.

The Ministerial Code also requires that those registrable interests which might be relevant to a Minister's public duties are published to ensure transparency, and I am expecting an updated publication to review very soon.

Currently there is no explicit requirement on Ministers to declare their interests at Cabinet meetings, but I would expect my Cabinet colleagues to draw attention to any actual or perceived conflict which they may have in relation to a particular meeting, either at the start of the meeting or raised with me in advance of the meeting. I will write round to them to remind them of this expectation and I am grateful to the Committee for their suggestion. We will also ensure that declarations are normally recorded in the minutes of meetings.

Yours sincerely,

**MARK DRAKEFORD**

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

[Gohebiaeth.Mark.Drakeford@llyw.cymru](mailto:Gohebiaeth.Mark.Drakeford@llyw.cymru)  
[Correspondence.Mark.Drakeford@gov.wales](mailto:Correspondence.Mark.Drakeford@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.