

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

**D01**

**Ymateb gan: Douglas Bain, Comisiynydd Safonau**

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

**D01**

**Evidence from: Douglas Bain, Commissioner for Standards**

**By email**

Hannah Blythyn MS

Chair of the Standards of Conduct Committee

22 July 2025

Dear Chair,

**Inquiry into Individual Member Accountability – Donations**

I regret the slightly late response to this consultation.

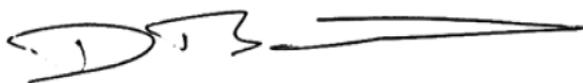
As a general point I believe that there is merit in keeping the provisions as simple as possible consistent with the requirement for transparency and accountability.

To that end, I believe consideration should be given to aligning any restrictions on who can donate with the Electoral Commission provisions. My views on the level of reporting and disclosure of donations remain as stated in my letter of 20 March 2025.

I do not support a cap on the donations from any one individual or entity. Unless such a provision was supported by detailed rules, it would be easy to avoid and so would serve no purpose.

It appears to me that a variation of the rules depending on the source of the donation would introduce unnecessary complexity and would also be straightforward to avoid.

Yours sincerely,



**Douglas Bain CBE TD**

**Y Comisiynydd Safonau/Standards Commissioner**

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We welcome correspondence in both English and Welsh

**Senedd Cymru**  
**Y Pwyllgor Safonau Ymddygiad**  
**[Atebolrwydd Aelodau Unigol o'r Senedd - Rhoddion](#)**  
**D02**

**Ymateb gan: Transparency International UK**

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**Welsh Parliament**  
**Standards of Conduct Committee**  
**[Individual Member Accountability - Donations](#)**  
**D02**

**Evidence from: Transparency International UK**

## INQUIRY INTO INDIVIDUAL MEMBER ACCOUNTABILITY - DONATIONS

*Transparency International UK's submission to the Senedd Standards of Conduct Committee Inquiry into Individual Member Accountability - Donations – July 2025*

### SUMMARY

Political donations are vital to our democracy, providing essential funding for parties and candidates to engage with the electorate. However, high reporting thresholds and the lack of limits on donations have contributed to a [decline](#) in the public's perception of the transparency of party and campaign finance in the UK, with only [24%](#) of respondents believing party funding is transparent in a recent survey.

Recent news stories in Wales, such as donations connected to [criminal investigations](#) received by the former First Minister, have also correlated with [low levels of trust](#) in the Welsh Government.

Transparency International UK welcomes the Standards of Conduct Committee's Inquiry into individual member accountability and donations. To rebuild trust and ensure adequate transparency and accountability of members' donations, we recommend:

**Recommendation 1: The Senedd should publish the amounts members receive as donations, including financial sponsorships and overseas trips.**

**Recommendation 2: The UK Government should reduce the reporting thresholds under Political Parties Elections and Referendum Act (PPERA) to £500.**

**Recommendation 3: Political parties should limit contributions to candidates standing for internal elections to £10,000 per year from any individual or organisation and impose meaningful limits on how much these candidates can spend.**

**Recommendation 4: Political parties and individual politicians should protect against the perception they are profiting from poor practice or others' misfortune by adopting and publishing policies outlining their due diligence processes and how they manage donations of questionable origin.**

**Recommendation 5: The UK Government should tighten the rules to ensure companies can only make donations from profits made in the UK in the last two years.**

**Recommendation 6: In line with best practice, the Senedd should continue to consider the option of introducing a statutory register of lobbyists.**

### AWARENESS

In order to ensure transparency, members of the Senedd and candidates are required to register the donations they receive, subject to reporting thresholds.

The rationale for disclosing only significant contributions attempts to balance the imperatives of the public interest with the right to privacy and administrative burdens. Setting them too low risks imposing undue bureaucratic burdens on those subject to reporting requirements, while setting them too high risks undermining the policy objective of transparency.

Welsh parliamentarians must comply with several sets of rules with separate reporting thresholds. Firstly, they must comply with the Standing Order 2 of the Senedd, which requires members to register any financial sponsorships as a Member of the Senedd and any sponsorship which, as a

candidate, exceeds 25 per cent of the candidate's elections expenses. These form a member's register of interests as published by the Welsh Parliament.

Paragraph 61 of the Guidance for Members of the Senedd on the registration, declaration and recording of financial and other interests, states that:

“Subsection (b) of this category relates to other forms of financial sponsorship. This is intended to cover any regular or continuing support from persons including companies or organisations from which the Member receives any financial or material benefit in support of his or her role as a Member of the Senedd.”

On the one hand this is a comprehensive rule as “any” financial benefit must be registered. On the other hand, the published member's financial interests don't include the amount that members do receive – only the fact they have and from whom.<sup>1</sup> This limits the public's ability to follow the money, as they don't have the figures. The same is true of overseas visits that members undertake, the date, destination, purpose and who met cost is published but not how much the trip cost. This is in contrast with the Westminster register of interests where trips over £300 are published.

There is an alternative way, however, to find out some of the figures. Under the Political Parties, Elections and Referendums Act (PPERA 2000) Senedd members must also comply with the rules for regulated donees. They must report any donation over £2,230 to the Electoral Commission, who in turn publish them. In this way we can see that seven Members of the Senedd have accepted over £30,000 worth of overseas trips in 2024 alone. This information is not necessarily easy to access for those who are not experts in electoral law, however. A more straightforward way to increase the accessibility of this data would be to include it in MSs register of interests.

Additionally, the reporting thresholds under PPERA were recently increased from £1,500 to the above mentioned £2,230 in 2023 without proper consultation or justification as to why. In order to counter the increasing opacity of donations, the reporting thresholds should at the very least return to pre 2024 levels and even better be reduced to £500.

**Recommendation 1: The Senedd should publish the amounts members receive as donations, including financial sponsorships and overseas trips.**

**Recommendation 2: The UK Government should reduce the reporting thresholds under PPERA to £500.**

## VALUE OF DONATIONS

As the amounts spent by political parties on campaigning increases over time, so has the expenditure by those seeking to lead them. It is now common for party leadership candidates to raise six figure sums, increasingly over half a million pounds, with no guarantee of success. Many have done so through substantial contributions from a relatively small group of wealthy donors. This fundraising strategy can create the perception that vested interests may buy politicians, and use their generosity to leverage favours if their beneficiaries secure high office. This was highlighted when the former First Minister, Vaughan Gething out fundraised his opponent, Jeremy Miles in the 2024 Labour leadership contest by £254,600 to £61,800.

Most of the larger political parties in Westminster already have leadership election rules, which can vary from contest to contest. Although many set a limit on how much candidates can spend, these are often very generous and invariably have no protections against candidates becoming

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<sup>1</sup> See the following as an example:

<https://business.senedd.wales/mgDeclarationSubmission.aspx?UID=249&HID=1387&FID=0&HPID=0>

dependent on a few sources for funding. The absence of strong safeguards in internal party elections poses a risk to parties' reputations, and the careers of their leaders. Fortunately, addressing this risk is within parties' powers and does not need legislation. Changing their internal election rules to limit how much any individual or organisation can donate to candidates would help protect them against the perception, or reality, of their leaders being bought.

**Recommendation 3: Political parties should limit contributions to candidates standing for internal elections to £10,000 per year from any individual or organisation, and impose meaningful limits on how much these candidates can spend.**

The Vaughan Gething case also raised questions about the legitimacy of the donations received. Some were linked to criminal investigations and convictions. When a politician is seen to receive contributions from those connected with wrongdoing it undermines public trust. Candidates and parties should do more to ensure the legitimacy of the donations they receive.

**Recommendation 4: Political parties and individual politicians should protect against the perception they are profiting from poor practice or others' misfortune by adopting and publishing policies outlining their due diligence processes and how they manage donations of questionable origin.**

Additionally, in order to ensure the integrity of donations from companies, there needs to be more conditions on which companies can donate to political parties and members. The law intends to allow companies to make political donations if they have an economic stake in the UK. However, this is currently defined as 'carrying on business', which in practice has proven to be a very low bar. This has enabled firms to donate even though they have [never turned a profit](#) and/or have no physical or [online presence](#), raising questions about the source of funds.

**Recommendation 5: The UK Government should tighten the rules to ensure companies can only make donations from profits made in the UK in the last two years.**

## ADDITIONAL ACCOUNTABILITY

Transparency International UK believes that in order to mitigate against any wrongdoing, lobbying should be open, transparent and ethical and that any regulatory response should also be proportionate, fit for purpose and not impede participation.

As a course of best practice, we support the introduction of comprehensive statutory lobbying registers that include in-house as well as multi-client and consultant lobbyists. Statutory registers are the most effective way to create the right incentives for appropriate behaviour and the sanctioning power to prevent abuses.

The purpose of such a register should be to reveal information about:

- who is being lobbied,
- the purpose of the lobbying (for example, the policy, issue or area of spending being targeted),
- the form of engagement (for example, meetings, phone calls, emails etc.), and
- an estimate of how much is spent on this activity.

In January 2018, when the Standards of Conduct Committee released [their report](#) into lobbying, they didn't receive conclusive evidence to support a statutory lobbying register. Some were in favour of it in order to prevent against future scandals and misuse of the system and others argued that it would be like a "sledgehammer to crack a nut".

If the Senedd wants to be in keeping with other, similar, democratic legislatures, and follow best practice, then a statutory register appears to be the right option.

For more information and evidence please [see Transparency International UK's submission](#) to the Inquiry into lobbying.

**Recommendation 6: In line with best practice, the Senedd should continue to consider the option of introducing a statutory register of lobbyists.**

## CONCLUSION

Whilst many of the levers to reform political finance remain at Westminster, and neither donations nor spending in Wales even begin to meet the amounts seen in the UK as a whole, it is vital that the devolved institutions do not fall into the pattern of relying on big donors and spending increasingly large amounts of money that we see prevailing nationally.

Transparency International UK recommends that the UK government should introduce donation caps of £10,000 per year for individuals and organisations in line with the 2011 report from the Committee on Standards in Public Life.

Cheques and Balances also recommends that political parties should limit contributions to candidates standing for internal elections to £10,000 per year from any individual or organisation, and impose meaningful limits on how much these candidates can spend.

The Committee may wish to consider how these proposals might be recommended to Members of the Senedd.

At a minimum, as well as supporting the recommendations above, including improving the financial transparency available in the Members Registers of Interests, Members of the Senedd could consider adopting and publishing policies outlining their due diligence processes and how they manage donations.

## ABOUT TRANSPARENCY INTERNATIONAL

Transparency International UK (TI-UK) is one of the UK's leading anti-corruption organisations. We carry out research into corruption in the UK, with the goal of upholding integrity in public life and protecting the public's resources.

TI-UK welcomes the Senedd Standards of Conduct Committee Inquiry into Individual Member Accountability and have provided evidence in relation to the previous area of work of this inquiry. We particularly welcome this examination of the issue of donations, and the explicit link to trust and accountability.

We would draw the committee's attention to [our submission to the previous inquiry into lobbying](#),<sup>2</sup> to which we also [provided oral evidence](#).<sup>3</sup>

We would also like to make the committee aware of our position paper on the influence of big money in UK politics: [Cheques and Balances](#), published in December 2024.<sup>4</sup> Additionally, we have

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<sup>2</sup> Available on the Senedd website

<https://business.senedd.wales/documents/s129946/6.%20Transparency%20International.pdf> [accessed 15<sup>th</sup> July 2025]

<sup>3</sup> <https://record.senedd.wales/Committee/13194> [accessed 15<sup>th</sup> July 2025]

<sup>4</sup> <https://www.transparency.org.uk/publications/cheques-and-balances-countering-influence-big-money-uk-politics> [accessed 15<sup>th</sup> July 2025]

recently published a number of ‘explainer’ articles on our website which provide some background information additional insights into political finance.<sup>5</sup>

## CONTACT

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<sup>5</sup> <https://www.transparency.org.uk/news/what-do-political-parties-politicians-and-political-campaigners-spend-money>;  
<https://www.transparency.org.uk/news/does-uk-politics-have-dark-money-problem>;  
<https://www.transparency.org.uk/news/how-our-electoral-law-enforced> [all accessed 15<sup>th</sup> July 2025]

**Senedd Cymru**  
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**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.<sup>1</sup> 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.<sup>2</sup> Many countries

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<sup>1</sup> 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>

<sup>2</sup> CSPL (2021) Regulating Electoral Finance [https://assets.publishing.service.gov.uk/media/60e460b1d3bf7f56801f3bf6/CSPL\\_Regulating\\_Election\\_Finance\\_Review\\_Final\\_Web.pdf](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.<sup>3</sup> 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).<sup>4</sup> 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).

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<sup>3</sup> 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>

<sup>4</sup> This amount increases each year.

In 2011, the Committee on Standards in Public Life recommended a donation limit of £10,000 each year.<sup>5</sup> 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

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<sup>5</sup> <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.<sup>6</sup> 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,<sup>7</sup> and at a UK level.

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

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

**Senedd Cymru**  
**Y Pwyllgor Safonau Ymddygiad**  
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**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 of 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**