

Rt Hon Elin Jones MS, Llywydd and Chair of Business Committee

By email

4 February 2026

Dear Elin,

Thank you for your letter setting out the Business Committee's consideration of the Standards of Conduct Committee's recommendations on the registration and declaration of interests.

The Standards of Conduct Committee has considered your request that the guidance should include a test of relevance specifically in relation to declarations made at the point of tabling, and that this should provide clarity on expectations for Members who table business on behalf of others, such as the government, the Senedd Commission, committees or political groups.

As you note, the Committee has already agreed in principle to propose amendments to the Guidance on the Registration and Declaration of Interests, including the addition of a test of relevance setting out factors that may influence whether it might be reasonable for others to think that an interest has influenced a Member's contribution. The Committee has confirmed that the Commissioner for Standards would be content for the following wording to be added to the guidance:

Factors that may influence whether it might be reasonable for others to think that the interest influenced the contribution include:

- *the nature of the interest and how commonly held it is. For example, there is no need to declare if the interest is common to all Members (e.g. a Member's salary or being an employer) or if the interest is common to a very broad category of people to which the Member belongs (e.g. taxpayers, parents, users of the NHS);*
- *the capacity in which the Member is participating at the time (e.g. individual Member, Minister, Committee Chair, Commissioner or other office-holder);*
- *the context in which their contribution is being made, e.g. whether the Member is proactively raising the issue to which the interest relates; and*
- *the nature of the contribution and the factors other than the interest that will have influenced it, including whether the contribution could reasonably be considered by others to be promoting the Member's relevant interest at the expense, or to the detriment, of the interests of others.*

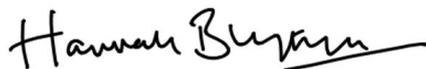
The same principles apply both to oral declarations and declarations when tabling business. In the context of tabling business specifically, the 2nd and 3rd factors above, taken together, mean that the test would be less likely to be met if the Member is only formally tabling on behalf of others in their capacity as an office-holder - e.g. the government, Senedd Commission, a committee or a political group - than if the Member is tabling on their own behalf and/or has instigated the tabling of the business in question.

The Committee agrees that the same principles should apply both to oral declarations and to declarations made when tabling business. In the specific context of tabling, the Committee considers that the second and third factors above, taken together, provide an appropriate basis for addressing the point raised by the Business Committee. In particular, they support the position that the test of relevance is less likely to be met where a Member is tabling business solely in their capacity as an office-holder acting on behalf of others, than where a Member is tabling business on their own behalf or has instigated the tabling of the business in question.

If you are content, the Committee will incorporate this clarification into the revised guidance, ensuring that Members have clear and practical direction on when a declaration is expected at the point of tabling, and when it is unlikely to be required.

We appreciate the Business Committee's continued engagement with this work.

Yours sincerely,



Hannah Blythyn MS

Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.