

**Senedd Cymru**  
**Y Pwyllgor Safonau Ymddygiad**  
**[Adolygiad o God Ymddygiad Aelodau o'r Senedd](#)**  
**RC04**

**Ymateb gan: FDA**

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**Welsh Parliament**  
**Standards of Conduct Committee**  
**[Review of the Code of Conduct for Members of the Senedd](#)**  
**RC04**

**Evidence from: FDA**

2026



# **FDA RESPONSE TO REVIEW OF CODE OF CONDUCT FOR MEMBERS OF THE SENEDD**

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## **REVIEW OF THE CODE OF CONDUCT FOR MEMBERS OF THE SENEDD**

### **FDA RESPONSE**

The FDA is the union for managers and professionals in public service, representing more than 25,000 members at grades HEO and above. Membership includes senior civil servants, government policy advisors, prosecutors, diplomats, tax professionals, economists, solicitors and other professionals working across the Government and the NHS.

Thank you for the opportunity to respond to this consultation. We have limited our comments to the Questions relating to proposals 4 and 6.

We consider that these proposals represent positive steps to protect FDA members from abuse by Members of the Senedd (MSs) and helps codify their rights as employees.

### **Proposals – and the FDA’s responses**

#### **Proposal 4: introduce a new rule requiring Members to act as responsible employers**

We strongly support the introduction of a new rule requiring Members of the Senedd (MSs) to act as responsible employers.

It is essential that MSs recognise both their formal status as employers and the inherent power imbalance this creates in the employment relationship. MSs should be setting a clear template for good employment practice and modelling the standards of behaviour that the FDA would expect of any responsible employer. Too often, the union has had to intervene to support FDA members who have experienced poor treatment across all four UK administrations. Clearer, enforceable expectations on MSs as employers are therefore both necessary and overdue.

The proposals align with the standards the FDA would expect of government bodies and employers across the wider Civil Service and public sector, indeed the obligation to act as a ‘responsible employer’ goes further than we have seen in some areas and should be seen as the paradigm. In particular, the requirement for MSs to maintain a clear Code of Conduct for staff, alongside a comprehensive Staff Handbook including grievance and disciplinary procedures and policies on dignity and respect at work, reflects

basic good practice. In the current context, it is entirely reasonable to expect such standards to be clearly codified.

We are clear that it is not acceptable for staff to operate in environments where expectations of behaviour are implicit, informal, or inconsistently applied. Clear, written policies are a fundamental safeguard in this respect.

We also strongly support the Committee's expectation that MSs and their staff should undertake training related to dignity and respect. The FDA would go further; we would propose that MSs be required to complete mandatory training on matters relating to dignity and respect within six months of appointment. We welcome the proposal that failure to attend such training may be taken into account in matters brought before the Standards of Conduct Committee.

**Proposal 6: amend Rule 21 to prohibit Members from trying to persuade potential complainants or witnesses not to come forward**

We strongly support the proposed amendment to Rule 21. We have long been concerned that the current wording of the Code does not explicitly prohibit Members of the Senedd (MSs) from attempting to dissuade potential complainants or witnesses from coming forward. The consultation sets out a much stronger formulation which provides much-needed clarity, and closes an important gap in the current framework which may act as a barrier for genuine complaints being made.

We agree that the stronger form of words set out in the consultation will make it a breach of the Code for MSs to enter a Non-Disclosure Agreement (NDA) with staff or former staff that sought to prevent them from making a complaint or giving evidence about the MS's conduct.