



**Dr Chris Llewelyn**  
Prif Weithredwr / Chief Executive

**Cymdeithas Llywodraeth Leol Cymru**  
**Welsh Local Government Association**

<b>Un Rhodfa'r Gamlas</b>	<b>One Canal Parade</b>
Heol Dumballs	Dumballs Road
Caerdydd	Cardiff
CF10 5BF	CF10 5BF
Ffôn: 02920 468680	Tel: 02920 468680

Ein Cyf / Our Ref: CL/PW/POAB/  
Dyddiad / Date: 1<sup>st</sup> December 2025



Mike Hedges MS  
Chair, Legislation, Justice and Constitution Committee  
Senedd Cymru / Welsh Parliament  
Cardiff  
CF99 1SN

Dear Chair,

## **Public Office (Accountability) Bill Legislative Consent Memorandum**

Thank you for your letter of 6<sup>th</sup> November 2025 regarding the Committee's scrutiny of the Legislative Consent Memorandum for the Public Office (Accountability) Bill. On receipt of your letter I contacted local authority Chief Executives and Monitoring Officers and welcome the opportunity to provide you with a summary of their views on the proposals contained in the Bill.

### **Involvement and Consultation**

Local authorities in Wales report that they have not been directly involved in the development of the Bill, nor have they been formally consulted on its provisions. Engagement to date has been limited to information shared by Welsh Government and publicly available material. Councils who responded have expressed a desire for more meaningful engagement, particularly given the Bill's significant implications for devolved governance and the operation of local authorities in Wales.

### **Scope, Impact, and Unintended Consequences**

Councils broadly support the principles of transparency, candour, and accountability, especially in relation to public inquiries and investigations. However, there are

concerns about the breadth of the new statutory duties and criminal offences introduced by the Bill. Authorities have highlighted the risk that the Bill's provisions may duplicate or complicate existing Welsh frameworks, such as the Members' Code of Conduct, the Code of Conduct for Local Government Employees, and established whistleblowing arrangements.

There is a particular concern that the Bill could create parallel regimes, leading to uncertainty over which standards apply in a given situation and potential conflicts between UK and devolved law. Councils have also raised the risk of over-deterrence, where officers may feel personally exposed and become hesitant to take proportionate decisions, potentially inhibiting effective public service delivery. The broad drafting of new criminal offences, especially regarding the threshold for "recklessness" or "seriously improper acts", could have a chilling effect on decision-making, discourage openness, and undermine a culture of learning and improvement.

## **Resource and Operational Implications**

Councils anticipate significant resource and administrative implications, including the need to revise codes of conduct, provide additional staff training, and ensure compliance with new statutory duties. There are concerns about increased legal defensiveness, additional costs, and the risk of double jeopardy or conflicting disciplinary and legal processes.

## **Duplication of Existing Mechanisms**

Welsh local government already operates under a comprehensive and mature governance and ethical standards regime. Councils have emphasised the importance of ensuring that any new statutory duties are aligned with, and do not undermine, the effectiveness of existing Welsh frameworks. There is a strong call for clear guidance and legislative clarity on the relationship between the Bill and current mechanisms, as well as on the practical operation of the new duties.

## **Commitment to the Charter for Families Bereaved by Public Tragedy**

Welsh local authorities are committed to supporting bereaved families and survivors of public tragedies. Earlier this year, all local authorities in Wales signed the Charter for Families Bereaved by Public Tragedy. This Charter commits organisations to openness, transparency, and accountability, and to placing the needs of bereaved families at the heart of their response to major incidents. The Charter represents a significant cultural shift and demonstrates the sector's proactive approach to learning lessons from past tragedies and supporting those affected in the future.

## **Conclusion**

Welsh local government is committed to upholding the highest standards of public service and accountability. Councils urge that any new statutory duties are

developed in close consultation with devolved governments and local authorities, to ensure alignment with existing frameworks and to avoid unintended consequences. Please do not hesitate to contact me if you require any further information or clarification.

Yours sincerely,



Dr Chris Llewelyn  
**Chief Executive**