

Cynulliad Cenedlaethol Cymru / National Assembly for Wales  
Y Pwyllgor Safonau Ymddygiad / Standards of Conduct Committee  
Ymchwiliad i Lobïo / Inquiry into Lobbying  
Ymateb gan Ffederasiwn Busnesau Bach Cymru / Evidence from Federation of  
Small Businesses Wales

Dear Jayne

RE: Inquiry into lobbying

FSB Wales welcomes the opportunity to contribute to the Standards of Conduct Committee's inquiry into lobbying in Wales. As an organisation representing around 10,000 smaller businesses the length and breadth of Wales, we take our role as the leading advocate of small businesses very seriously.

At the heart of our work as a federation is the desire to improve policy-making in Wales by facilitating engagement between politicians of all parties, the civil service and civil society with Wales' small businesses. Our members are citizens of Wales in their own right and we see this role as vital in making devolution work effectively.

As a business representative body, our members join for three principal reasons; to benefit from the services we offer, as an opportunity to increase their network and to ensure their voice and influence is brought to bear on the decision making process at all levels.

Our membership is as diverse and varied as the people of Wales as a whole. With around 10,000 members we are a pluralist organisation not guided by any particular vested interest or sector. We recognise that there is no such thing as "the voice of business" and that there are a number of competing views on many issues from the business community.

As a point of principle, FSB Wales believes that there is a need for improvement in the proximity and engagement between decision making and citizens in Wales. We would include SMEs as a key social group within this definition. A key element of this must be to improve the understanding among the business community of how the institution of the National Assembly for Wales works and how businesses can better inform decision making in the interest of Wales as a whole. In particular, this should focus on engagement with individual AMs in their representative role.

FSB Wales' principal framework for engagement with the Welsh Government is through the statutory Business Scheme detailed within the Government of Wales Act 2006. This licences the Council for Economic Development (previously Council for Economic Renewal) as the main forum for engagement between business representative bodies and other social partners and the Welsh Government.

Beyond this, we are regularly consulted by government departments and committees of the National Assembly for Wales on our views of policy proposals as part of the formal consultation process. We also meet regularly with politicians of all political parties to help inform their policy development by presenting our policy and research findings.

We would however draw a distinction between the activity of our staff who are often employed in public affairs and policy-facing roles and the activity of our 10,000 members. Any proposals to regulate lobbying in Wales must recognise the challenges a broad membership organisation such as ourselves faces in facilitating dialogue between our 10,000 members and decision makers. In this respect, we would envisage many other organisations such as trade unions, charities and campaign groups or other trade bodies would raise similar issues.

The recent announcement by the First Minister that all cabinet secretaries and ministers would be publishing their diaries is a welcome step forward and in our view seems to address what is required in terms of transparency. This is the simplest way to increase that transparency in a proportionate way without unduly burdening organisations such as ourselves.

We welcome the committee's consideration of this important issue and would be happy to provide any further information required in formulating recommendations.

Yours faithfully