



Nick Ramsay AM  
Chair  
Public Accounts Committee  
National Assembly for Wales

28 June 2017

Dear Nick,

I write in response to your letter of 11<sup>th</sup> May. Your Committee's report into the support provided by the Welsh Government to Kancoat, recommended that I ensure the Ministerial Code requires consideration of perceived conflicts of interest and that the outcome of such consideration is formally fully documented.

The Ministerial Code already requires Cabinet Secretaries and Ministers to take particular care over decisions which could give rise to the possibility of a conflict of interest arising from their portfolio responsibilities and their constituency interests. Cabinet Secretaries and Ministers are personally responsible for their actions and behaviour and must justify their conduct to the Assembly if necessary. If they consider there is the *possibility* of a conflict of interest, advice is sought from my office and where such referrals are made, they are documented, so in this regard the recommendation is already satisfied. I consider the term *possibility* to be broad enough to capture matters which, in the opinion of a Cabinet Secretary, might give rise to a *perception* of a conflict of interest.

I will be writing to Cabinet Secretaries and Ministers asking that they are mindful of decisions taken on matters outside their constituencies which might be of incidental benefit to their constituents and if the benefit is considered significant enough that it should be referred to my office for advice on handling.

Yours sincerely

**CARWYN JONES**

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.