

Inquiry into Registration and Declaration of Interests

Declaration of Interests

January 2026



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About the Committee

The Committee was established on 23 June 2021. Its remit can be found at:
www.senedd.wales/SeneddStandards

Current Committee membership:



**Committee Chair:
Hannah Blythyn MS**
Welsh Labour



Mick Antoniw MS
Welsh Labour



Tom Giffard MS
Welsh Conservatives



Peredur Owen Griffiths MS
Plaid Cymru

The following Members were also members of the Committee during this inquiry.



Natasha Asghar MS
Welsh Conservatives



Mark Drakeford MS
Welsh Labour



John Griffiths MS
Welsh Labour



Vikki Howells MS
Welsh Labour



Samuel Kurtz MS
Welsh Conservatives

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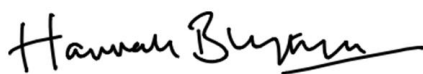
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Chair's foreword

This is the second and final report from the Committee's inquiry into registration and declaration of interests. As reflected on previously, registering and declaring interests is an important tenet of a Parliament. It provides transparency around financial and other interests held by elected Members which could be thought to influence them and their conduct in the Senedd.

Our report on amendments to the rules around registration sought to simplify the rules and increase transparency around the register. These are the core principles of this report as well. We are recommending simplifying the declaration requirements under Standing Order 2 to remove the prohibition on voting if a Member has declared a registerable interest under Standing Orders 2.6 and 2.7. It does not change the requirement to declare interests, but removes a rule which has never been triggered, and which is out of kilter with other Parliaments. More significantly, we are increasing the requirements on Members to declare relevant interests, by recommending that Members have to declare interests when tabling Senedd business, and that more information is included when an interest is declared.

Finally, we are proposing declarations are made by Members of the Senedd when they are undertaking their duties not in the Senedd, such as when corresponding with Ministers or other Public Officials. We have concluded that this requirement be included in the Code of Conduct, and will consider the matter further as a part of the review of the Code. I would like to thank everyone who provided evidence to this inquiry and helped shape the recommendations in this report. The changes we are proposing will encourage greater transparency and consistency in time for the Seventh Senedd.



Hannah Blythyn MS

Chair of the Standards of Conduct Committee

Recommendations and Conclusions

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1. Introduction and Background

- 1.** The Standards of Conduct Committee (“the Committee”) has undertaken a review into the registration and declaration of Members’ interests with the aim of ensuring that the rules and practices are fit for purpose for the Seventh Senedd. The Committee considered it timely to undertake work in this area as the last substantial review in this area was in 2014.
- 2.** The Committee ran an initial consultation on the registration and declaration of interests from 6 March to 24 April 2023. Following its consideration of the responses, the Committee agreed to undertake separate work on registrations and declarations of interest. This report relates to declarations of interests – the report on registration of interests was published in July 2025¹.
- 3.** To further inform its review of the Senedd’s rules around declaring interests, the Committee considered how other parliaments in the UK and Ireland manage the declaration of interests and compared their practices to those of the Senedd. The Committee used this information, alongside the consultation responses, to draw up draft proposals for change. These proposals informed a second, targeted, consultation with Members, the Commissioner for Standards, and the Llywydd. The Committee also shared these draft proposals with the Chief Executive and Clerk of the Senedd.
- 4.** This report makes a number of recommendations proposing a range of changes to current practice in the Senedd. The Committee proposes that all the changes be brought into force for the start of the Seventh Senedd in May 2026.

¹ [Inquiry into Registration and Declaration of Interests: Registration of Interests](#)

2. Declaration of registrable interests and prohibition on voting

5. Standing Order 2: Financial and Other Interests of Members includes the following provisions:

2.6 In the circumstances specified in Standing Order 2, before taking part in any Senedd proceedings, a Member must make an oral declaration of any financial interest which he or she has, or may be expecting to have, or which, to the Member's knowledge, the Member's partner or any dependent child of the Member has, or may be expecting to have in any matter arising in those proceedings.

2.7 An oral declaration under Standing Order 2.6 must be made in relation to any interest which is specified in paragraph 5 of the Annex to Standing Order 2 if a particular decision in those proceedings might result in a direct financial advantage to the Member, or, to the Member's knowledge, the Member's partner or any dependent child of the Member, greater than that which might accrue to the electorate generally.

2.9 Where a Member is required under Standing Order 2.6 to declare an interest in a matter before taking part in any Senedd proceedings, that Member must not vote on any proposal relating to that matter in those proceedings. Standing Order 2.9 does not apply in relation to the exercise of a casting vote under Standing Order 6.20.²

6. The sum effect of these provisions is that where a Member, their partner, or dependent child has a registrable financial interest in a matter arising in proceedings, and the Senedd is taking a decision that might result in a direct financial advantage to the Member greater than that which might accrue to the electorate generally, they must make an oral declaration, and – having made that declaration – must not take part in any vote relating to that matter.

7. These requirements have their basis in section 36 of the 2006 Act. Section 36 requires the Senedd's Standing Orders to have a provision regarding the declaration of financial interests. It also gives the option for the Standing Orders to

² [Standing Orders of the Welsh Parliament](#)

provide for preventing or restricting the participation in any proceedings of a Member who has declared such an interest. As Standing Orders currently state that a Member must not vote on a proposal in relation to which they must make an oral declaration under Standing Order 2.6, voting in those circumstances would currently constitute a criminal offence under section 36(7) of the Act.

8. The requirement was broadened following a review in 2014, from a direct financial advantage “greater than that which might accrue to persons affected by the decision generally” to “greater than that which might accrue to the electorate generally”. Despite this, the nature of the requirement around prohibition on voting means it would only be triggered in very specific circumstances, and there are no instances of it being triggered in the Senedd/Assembly.

9. The Committee noted that no other legislature in the UK or Ireland has such a rule, though comparable requirements do exist in the Isle of Man and Jersey, and a requirement to withdraw from consideration and/or voting in relation to a matter where a member has a personal interest is included in the Model Code Of Conduct For Members Of County, County Borough And Community Councils, Fire Authorities And National Park Authorities In Wales.³

10. The Committee also noted that the Senedd and other legislatures, unlike local authorities and governments at all levels, do not generally take decisions that would lead to individuals gaining a direct financial benefit, and that the rule appears to be a legacy of the then Assembly’s corporate body structure between 1999 and 2006, prior to the legal separation of the Assembly and Welsh Government.

11. The Committee further noted that a recent report by the Commissioner for Standards suggested that some Members conflate this rule with the far broader requirement to declare relevant interests, for example by considering that a declaration is only needed where a decision is being made.⁴

12. For these reasons, the Committee proposed in its second consultation that the rule around prohibition on voting in Standing Order 2 should not be retained. In his response to that consultation, the Commissioner agreed that the rule in Standing Order 2 around prohibition on voting should be removed with Members able to participate fully in any vote, provided any interest in the subject matter has been declared and so is in the public domain. The Plaid Cymru group also agreed

³ [The Conduct of Members \(Model Code of Conduct\) \(Wales\) Order 2001](#)

⁴ [Nineteenth report to the Sixth Senedd under Standing Order 22.9](#)

with the proposal to remove the rule in Standing Order 2 around prohibition on voting.

13. The Committee considers removing this requirement will add clarity to the declaration requirements for those participating in, and following, Senedd proceedings.

Recommendation 1. The Committee recommends to the Business Committee that Standing Order 2 be amended to remove the prohibition on voting in Standing Order 2.9 where a Member has declared a registerable interest under Standing Orders 2.6 and 2.7.

3. Declaration of relevant interests

14. The main change resulting from the 2014 review was the introduction of a requirement in the Standing Orders for Members to make an oral declaration of any relevant interests which the Member or a family member has or is expecting to have in any matter arising in Senedd proceedings. It was considered that introducing a wider need for declaration alongside the very narrow requirements of Standing Order 2 would both add clarity and would be in the public interest in terms of transparency.

15. The requirement to declare relevant interests is set out in Standing Orders 13.8A (Plenary) and 17.24A (committees), and requires Members to *‘declare any interest, financial or otherwise, that the Member, or to their knowledge, a family member, has or is expecting to have which is relevant to those proceedings, and might reasonably be thought by others to influence the Member’s contribution.’*

16. Unlike the Standing Order 2.6 requirement, failure to declare a relevant interest under Standing Orders 13.8A and 17.24A is not a criminal offence under the 2006 Act, but it may be the subject of a complaint to the Commissioner for Standards.

Form of declarations

17. Responses to the Committee’s initial consultation suggested that the Guidance for Members of the Senedd on the registration, declaration and recording of financial and other interests⁵ (“the Guidance”) could be strengthened by:

- requiring Members to specify the exact nature of the interest they are declaring;
- providing a pro-forma wording for Members.

18. It was suggested this would ensure that Members are always providing sufficient information when they declare an interest and that declarations were meaningful, with the nature of the interest set out rather than just referred to. It was also suggested that training be provided to Members regarding the requirements around declaring relevant interests.

⁵ [Guidance for Members of the Senedd on the registration, declaration and recording of financial and other interests](#)

19. The Committee noted that paragraph 23 of the Guidance to the current rules, already specifies that Members are required to provide sufficiently informative declarations which detail the nature of the interest being declared. Examples of wording are also included in the guidance.

20. The Committee intends to review the Guidance in advance of the Seventh Senedd, and will consider whether it can be strengthened in terms of making clearer what kind of information should be included in declarations. The Committee is also aware that Senedd Commission officials are preparing training for new and returning Members after the May 2026 election that will include the registration and declaration of interests as a priority.

When a declaration is required

21. The Committee's twenty-first report to the Sixth Senedd under Standing Order 22.91⁶, published on 2 July 2025, concerned a report from the Commissioner for Standards relating to a failure to declare a relevant interest in Plenary proceedings. The report gave rise to questions regarding when a declaration is necessary, and the Committee agreed to look at whether the guidance for declaring relevant interests could be expanded to provide more advice to Members regarding the kind of factors that might affect whether a declaration is required or not.

22. The complaint in the twenty-first report referred to a Member, acting in her capacity as First Minister, mentioning Unite the Union in her response to a question on a statement on Tata Steel when she was both a member of the Union and had previously received financial sponsorship from them. The Member did not declare a relevant interest under Standing Order 13.8A before making this contribution.

23. The Member, in her response to the Commissioner, had highlighted a number of reasons for her coming to the conclusion that the interest could not reasonably have been thought to influence the contribution, including:

- acting at the time in her capacity as the First Minister;
- referring to other trade unions as well as Unite; and
- the references to Unite were made in passing in a debate on a different subject.

⁶ [Twenty first report to the Sixth Senedd under Standing Order 22.9](#)

24. While the Committee agreed with the Commissioner's conclusion that it was clear that the Member had a relevant interest, the Committee also had some sympathy with the view that these could be considered valid reasons for the Member to have concluded that the interest had not influenced her contribution.

25. The Committee sought clarification from the Commissioner about how he concluded this interest might be reasonably thought to have influenced the Member's contribution. The Commissioner's position was that the use of the term 'might... influence' required a different interpretation to 'had... influenced', given that 'might' does not require evidence of it actually having happened.

26. The Committee considers that the effect of the second limb of the test in Standing Order 13.8A (*...and might reasonably be thought by others to influence the Member's contribution*) is that there can be circumstances where, although a Member or their family member has or is expecting to have an interest which is relevant to those proceedings, it does not need to be declared because it could not be reasonably thought by others to influence their contribution. If that weren't the case, that part of the test would effectively be redundant.

27. The Committee noted that the House of Commons sets out guidance as to when a relevant interest need not be declared, which provides some clarity for MPs in this area:

6. The test of relevance is whether those interests might reasonably be thought by others to influence his or her actions or words as a Member.

7. Members are not required to declare an interest:

- a. a) if to do so would unduly impede the business of the House; for example, during oral Questions, when asking supplementary Questions, or when responding to a Ministerial statement; or*
- b. b) when voting, either in the House or in committee. But a Member who has a relevant registerable interest which has not yet been registered should seek to register it before the vote; or if this is not possible, as soon as possible afterwards; or*
- c. if that interest is a benefit is available to all Members, such as the parliamentary salary, or expenses met from parliamentary sources or from a scheme for parliamentary expenses; or*

- d. *if it is a benefit provided by the Member's own party (unless it is registerable under Category 2: Donations and other support for activities as a Member of Parliament)*⁷."

28. Similarly, the Northern Ireland Assembly Code of Conduct includes the following:

"7. You are not required to declare an interest:

- a. *when voting in plenary. But if you have a relevant registrable interest which has not yet been registered you should seek to register it before the vote; or if this is not possible, as soon as possible afterwards;*
- b. *if the interest is common to all Members, (e.g. an interest such as a Member's salary or being an employer);*
- c. *if the interest is common to a very broad category of people to which you belong (e.g. ratepayers; parents; public transport users etc. This exemption does not extend to membership of a profession)."*⁸

29. The Committee considers that the Senedd's Guidance would benefit from including similar advice to Members, and having consulted with the Commissioner for Standards, the Llywydd and party groups, intends to propose that the following text be included in the guidance when it is reviewed in advance of the Seventh Senedd.

The test of relevance is made up of two parts:

1. Whether the interest is relevant to the proceedings; and
2. Whether those interests might reasonably be thought by others to influence the Member's contribution, i.e. it would be reasonable for others to think that the Member's words or actions would have been different were it not for the existence of the interest.

Ultimately, it is for Members to decide whether these tests are met or not in each specific circumstance. In all cases, it is essential that Members consider the

⁷ House of Commons: The Guide to the Rules relating to the Conduct of Members

⁸ Twenty first report to the Sixth Senedd under Standing Order 22.9

interaction between the interest and the contribution from the perspective of others, rather than whether the Member themselves thinks that the interest has influenced their contribution.

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. an interest such as 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. is the Member proactively raising the issue to which the interest relates;
- the nature of the contribution and the factors other than the interest that will have influenced it, including whether the contribution could be considered by others to be promoting the Member's relevant interest at the expense or to the detriment of the interests of others.

30. The Committee wishes to reiterate however, that it is ultimately a Member's responsibility to decide whether declaring a relevant interest is necessary in any specific circumstance, and that Members should consult the Guidance and seek the advice of the Registrar in advance if they are in any doubt as to whether a declaration may be required.

Declaring relevant interests before voting

31. The Senedd's Standing Orders do not make specific provision regarding declaring relevant interests before voting, and the Guidance does not address the issue either. However, in 2015 the Registrar of Members' Interests, in consultation with the then Commissioner for Standards, provided the following advice to Members regarding declaring interests before voting:

"Given the factors that normally determine how Members vote, the circumstances where it could be reasonably thought that the decision to vote in a particular way has been influenced by a relevant

interest are likely to be rare, and certainly less common than for spoken contributions. However, if a Member does have a relevant interest, it will be necessary for them to declare it before voting, unless:

- *the interest has already been declared as part of the Member's contribution to the debate; and/or*
- *the interest has been registered by the Member in the Register of Members' Interests (in which case it will already be in the public domain). Please note that not declaring a relevant interest on the basis that it has already been registered only applies in relation to voting (so as not to impact disproportionately on proceedings) and not to speaking."*

32. The Committee noted that the advice to Members has remained consistent since then, but despite being occasionally re-circulated to Members as appropriate, it has never formally been integrated into the Guidance.

33. The Committee considered that the advice on declaring relevant interests should be integrated into the Guidance and consulted with the Commissioner to ascertain that the advice remains appropriate. In his response, the Commissioner proposed that Standing Orders should be amended to make it clear that Members are required to declare any relevant interests before voting, unless the interests were already in the public domain as a result of being in the Register of Members' Interests or having been declared during the Member's contribution to the proceedings.

34. This would bring the Senedd in line with other parliaments in the UK and Ireland. In the House of Commons, although Members are not required to declare an interest when voting either in the House or in committee, a Member who has a relevant registrable interest which has not been registered should seek to register it before the vote. In the Northern Ireland Assembly and in the Houses of Oireachtas, Members should seek to ensure prior to a vote taking place that any relevant interest is registered, or, where it is not, should register the interest immediately after the vote.

35. The Committee considered whether the requirements around declaring relevant interests before voting should be put in Standing Orders, but was concerned that doing so would require that the exceptions set out in the previous guidance and endorsed by the current Commissioner would also need to be set out in the Standing Orders. This could mean an unusual level of detail being

included in the Standing Orders, with consequences for the Committee and Commissioner's ability to adapt the detail of the rules in future should they wish to do so.

36. The Committee concluded that the requirement to declare a relevant interest 'before taking part in any proceedings' should be interpreted to include voting, in common with other uses of the term proceedings across Standing Orders. This will be made clear in the revised Guidance.

37. As well as requiring Members to comply with relevant Standing Orders, the Members' Code of Conduct also gives status to the Guidance, meaning that the Commissioner can have regard to it in investigating any complaint:

"5. The Senedd Commission may, from time to time, publish guidance for the assistance of Members and their staff in complying with the Code, and the Senedd Commissioner for Standards may have regard to such guidance in considering any complaint of a failure to comply with the provisions of the Code."

38. The Committee therefore intends to propose that the Guidance is amended to integrate the Commissioner's advice on declaring relevant interests before voting as part of the review of the guidance in advance of the Seventh Senedd.

Declaring relevant interests when tabling business

39. Currently, Members have the option of declaring an interest when tabling business through a tick-box in the online tabling portal, or on the amendment-tabling form for Bills. If the box is ticked an [R] appears next to the tabled business once published to indicate that the Member has declared an interest, but no detail regarding the nature of the interest being declared is published.

40. The Committee observed that this process is optional rather than a requirement and it is not set out in either Standing Orders or the Guidance. As a result, its use by Members is inconsistent and there are no consequences for failing to declare an interest at the point of tabling.

41. The Committee noted that declaring interests at the point of tabling is a requirement in the House of Lords, the House of Commons, the Northern Ireland Assembly, and the Scottish Parliament.

42. The Committee agreed that in order to bring the Senedd into line with other legislatures, the declaration of relevant interests at the point of tabling should become a Standing Orders requirement and consulted on the draft proposal.

43. In responding to the Committee's second consultation, the Commissioner welcomed these proposals. The Plaid Cymru group also welcomed these proposals, noting that it would provide greater transparency if the detail was provided alongside the indication of a declaration of interest.

Recommendation 2. The Committee recommends to the Business Committee that it should be made a Standing Orders requirement that the relevant interests must be declared at the point of tabling business.

Recommendation 3. The Committee recommends to the Senedd Commission that it investigate the practicalities of having the nature of the interest made available via the Record, rather than just the current [R] symbol to improve transparency

4. Declaring interests outside of Senedd proceedings

44. In their response to the Committee's initial consultation, the Public Services Ombudsman for Wales suggested that a declaration could be made before any oral or written representations regarding a matter where a Member has a personal interest. As it stands, the rules only require Members to declare registrable and relevant interests when taking part in proceedings of the Senedd.

Practice elsewhere

45. In the House of Commons, the Code of Conduct requires Members to declare relevant interests both in proceedings, and also:

- a. In any communication, formal or informal, with those who are responsible for matters of public policy, public expenditure, or the delivery of public services. This included communications with Ministers, either alone or as part of a delegation: with other Members; with public officials (including the staff of government departments or agencies and public office holders). If those communications are in writing, then the declaration should be in writing too; otherwise it should be oral; and
- b. When booking facilities on the parliamentary estate.

46. In the House of Lords, Members are required to declare any relevant interests when communicating with ministers or public servants about matters related to public policy and parliamentary proceedings. "Public servants" includes servants of the Crown, civil servants, employees of government agencies or non-departmental public bodies, and members, officers and employees of local authorities or other governmental bodies.

47. In the Scottish Parliament, as in the Senedd, Members are only required to declare an interest before taking part in proceedings of the parliament. In the Northern Ireland Assembly, the requirement in the Members' Code of Conduct to declare a relevant interest at the appropriate time covers almost every aspect of a Member's Assembly duties extending to correspondence and meetings with Ministers, civil servants, and public officials.

48. The Committee considered whether Members should be required to declare any relevant or registrable interests outside of Senedd proceedings, such as when

communicating with Ministers, and noted the difficulty of including such a requirement in the Senedd's Standing Orders given that their scope is generally limited to Senedd business and proceedings.

Conclusion 1. The Committee concluded that it intends to review the Guidance in advance of the Seventh Senedd, and will consider whether it can be strengthened in terms of making clearer what kind of information should be included in declarations.

Conclusion 2. The Committee concluded that the Senedd's Guidance on declaring interests would benefit from including advice similar to that of the House of Commons as to when a relevant interest need not be declared, and intends to propose that specific text is included in the guidance when it is reviewed in advance of the Seventh Senedd.

Conclusion 3. The Committee concluded that it intends to propose that the Guidance is amended to integrate the Commissioner for Standards advice from 2015 on declaring relevant interests before voting as part of the review of the guidance in advance of the Seventh Senedd.

Conclusion 4. The Committee concluded that a requirement to declare any relevant or registrable interests outside of Senedd proceedings would be most appropriately included in the Members' Code of Conduct as is the case elsewhere, and agreed to consider the matter further as part of its review of the Code.

Annex 1: List of written evidence

The following people and organisations provided written evidence to the Committee. All Consultation responses and additional written information can be viewed on the [Committee's website](#).

Reference	Organisation
D01	Public Service Ombudsman for Wales
D02	Commissioner for Ethical Standards in Public Life in Scotland
D03	Senedd Labour Group
D04	Transparency International UK
D05	Welsh Conservative Group in the Welsh Parliament
D06	Senedd Commissioner for Standards