

Twenty fifth report to the Sixth Senedd under Standing Order 22.9

March 2026



The Welsh Parliament is the democratically elected body that represents the interests of Wales and its people. Commonly known as the Senedd, it makes laws for Wales, agrees Welsh taxes and holds the Welsh Government to account.

An electronic copy of this document can be found on the Welsh Parliament website: **www.senedd.wales/SeneddStandards**

Copies of this document can also be obtained in accessible formats including Braille, large print, audio or hard copy from:

Standards of Conduct Committee
Welsh Parliament
Cardiff Bay
CF99 1SN

Tel: **0300 200 6565**

Email: **SeneddStandards@senedd.wales**

© **Senedd Commission Copyright 2026**

The text of this document may be reproduced free of charge in any format or medium providing that it is reproduced accurately and not used in a misleading or derogatory context. The material must be acknowledged as copyright of the Senedd Commission and the title of the document specified.

Twenty fifth report to the Sixth Senedd under Standing Order 22.9

March 2026



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

Contents

Recommendations	5
1. Introduction	6
2. Consideration of the Complaint.....	7
3. Committee’s Consideration of its Decision	9
The Committee’s Decision	9
Committee’s recommendation.....	11
4. Lessons learnt from this complaint.....	12
Annex A - Report from the Commissioner for Standards.....	13

Recommendations

Recommendation 1. The Committee recommends to the Senedd, in accordance with paragraph 8.22(a) of the Procedure, that a breach has been found and the Member be censured under Standing Order 22.10(i)..... Page 11

1. Introduction

1. The terms of reference of the Standards of Conduct Committee (“the Committee”) are set out in Standing Order 22¹. In accordance with the functions set out in Standing Order 22.2, the Committee must:

“investigate, report on and, if appropriate, recommend action in respect of any complaint referred to it by the Commissioner for Standards.”²

2. This report is made to the Senedd under Standing Order 22.9 and paragraph 8.23 of the Procedure for Dealing with Complaints against Members of the Senedd³ (“the Procedure”) in relation to a complaint made against Janet Finch Saunders MS.

3. The report from the Commissioner for Standards (“the Commissioner”) on his investigation of the complaint is attached at Annex A. It sets out the details of the complaint and the findings of the Commissioner’s formal investigation.

4. This report sets out the details of the complaint and the Committee’s deliberations in arriving at its decision.

5. A copy of this report has been provided to the Member concerned and the Complainant.

¹ Standing Orders

² Standing Order 22.2(i)

³ The Senedd’s Procedure for Dealing with Complaints Against Members of the Senedd

2. Consideration of the Complaint

6. The Commissioner received a complaint in relation to the conduct of Janet Finch Saunders MS (“the Member”). The Chief Executive and Clerk (“the Complainant”), under her duty in section 9 of the National Assembly for Wales Commissioner for Standards Measure 2009 (“the Measure”), referred an allegation that the Member “*was attempting to get*” two of her support staff “*to do Conservative Party Connect Calling on Friday afternoons during their work time*”.

7. Having received further information from the complainant, the Commissioner identified a further allegation that the Member had bullied her support staff. Consequentially, the Commissioner extended the scope of his investigation to include that alleged misconduct.

8. In his assessment of the complaint, the Commissioner considered the following rules from the Code of Conduct as the most relevant:

Code of Conduct for Members of the Senedd

Rule 1 - Members must uphold the Overarching Principles.

Rule 4 - Members must not engage in unwanted behaviour, harassment, bullying or discrimination.

Rule 8 - Members must comply with the rules made from time to time by the Clerk and Chief Executive of the Senedd as Principal Accounting Officer of the Senedd Commission on the use of resources provided to Members by the Senedd Commission.

Rule 24 - Members must take reasonable measure to ensure that their staff, when acting on their behalf, also uphold and act in accordance with these Rules and the Overarching Principles.

Rules and Guidance on the Use of Senedd Resources⁴

Rule 1 of the Rules and Guidance - Members are personally accountable for the use of Commission resources made available to them and must not use them for party political

⁴ [The rules and guidance on the use of Senedd Resources July 2022](#)

activity or for any purpose other than the discharge of their duties as a Member.

9. The Committee met on 23 February 2026 to consider the Commissioner's report and reach its conclusion in respect of this complaint.

3. Committee's Consideration of its Decision

11. The Committee considered whether the Member was in breach of Standing Order 22.2(i).⁵

12. In considering whether a breach took place, the Committee reviewed the findings of the Commissioner as set out in his report.

13. The Member did not avail herself of the opportunity to make oral representations to the Committee.

The Committee's Decision

14. The Committee noted the finding of the Commissioner that:

“There can be no doubt that between 12 November 2024 and August 2025 whilst in receipt of pay as one of the Member’s support staff, [...] did, when working in her constituency office using ICT equipment/email account provided by the Senedd Commission for party political work on behalf of the Welsh Conservatives. The evidence for that is to be found in the 52 emails and the testimony of [Support staff] and the Member herself. These emails were about party political matters and almost all of them were either sent by the Member, sent to the Member or copied to her.”

15. The Committee noted the actions taken by the Member in relation to raising the improper use of Senedd resources with the staff Member via email on 23 June 2025. However, despite stating in the email ‘that there must be no repetition’ of this, the Committee notes that further emails were sent between the Member and support staff of a party political nature after this date.

16. In addition to the use of the support staff and ICT equipment, the Committee noted that the findings of the Commissioner that the constituency office had been used to store party political materials such as copies of Welsh Conservatives survey forms.

17. The Committee agreed with the Commissioner’s opinion that:

⁵ Standing order 22.2(i)

“... the Member used Senedd resources including [name of support staff], her constituency office and the ICT equipment/email account there for party political purposes. By doing so she contravened Rule 1 of the Rules and Guidance on the Use of Senedd Resources and so Rule 8 of the Code of Conduct for Members of the Senedd. The Guidance to that Rule provides ‘an incidental occurrence or reference to something party political during the otherwise proper conduct of a Member’s duties is unlikely to amount to a breach of this Rule.’ I am satisfied that the party political use which I have found established and which the Member is deemed to have admitted cannot properly be regarded as incidental”

18. The Commissioner sets out in his report that arranging a political calling session in the constituency office, even though the meeting did not take place, was inconsistent with the Member’s duty to take reasonable measures to ensure her staff, when acting on her behalf, also upheld and acted in accordance with the provisions of the Code of Conduct. The Committee therefore agrees that this was a breach of rule 24.

19. The Committee agreed with the Commissioner’s view that, given the Member’s experience and her position as a Senedd Commissioner, she had a particular responsibility to set a high standard of conduct for her staff, for other Members, and for the public. By permitting, and on occasions initiating, the repeated use of Senedd resources for party political purposes, the Member failed to demonstrate the leadership expected of her. The Committee therefore agrees that the Member breached Rule 1 of the Code of Conduct.

20. The Commissioner found that the Member expected high standards from her staff and made numerous demands on their time. The Member acknowledged that she was “direct” in her interactions with staff, but denied making unreasonable demands or behaving in a rude manner. The Commissioner concluded that, on the evidence available, the conduct described did not meet the threshold for a breach of Rule 4 relating to bullying. The Committee agreed with this finding.

21. Having considered the Commissioner’s findings and conclusions, and the supporting evidence provided, the Committee agreed that the following breaches of the Code of Conduct identified by the Commissioner had occurred:

The Committee finds that Janet Finch Saunders MS breached Rules 1, 8 and 24 of the Code of Conduct.

The Committee finds that Janet Finch Saunders MS did not breach rule 4 of the Code of Conduct.

Committee's recommendation

22. The Committee considers a breach of the Code of Conduct by any Member of the Senedd to be a serious matter. The reputation of the Senedd as an institution, and the public's trust and confidence in it, rely upon Members demonstrating integrity and leadership through their actions.

23. The Senedd provides publicly funded resources for Members to carry out their democratic functions. The clear misuse of resources in this report highlights the need for Members to be familiar with the rules governing when and where Senedd resources can be used. It is incumbent upon us as elected representatives to understand the distinction between party political activity and the discharge of our duties as Members. This is especially pertinent in the context of the upcoming election – a time of heightened political sensitivity. It is each Member's responsibility to ensure they – and their staff – understand and comply with these rules.

Recommendation 1. The Committee recommends to the Senedd, in accordance with paragraph 8.22(a) of the Procedure, that a breach has been found and the Member be censured under Standing Order 22.10(i).

4. Lessons learnt from this complaint

24. This report relates to the misuse of Senedd resources as set out in the Rules on the use of Senedd resources issued by the Chief Executive and Clerk to the Senedd. The Committee would like to remind all Members in this Senedd and future Seneddau of the importance of familiarising themselves with these rules as well as the Code of Conduct and other associated documents.

25. When establishing their staff and offices in the seventh Senedd, Members should consider what measures are needed to ensure a clear separation between the arrangements for carrying out their duties as a Member and for undertaking party political activity.

Annex A – Report from the Commissioner for Standards

STANDARDS CONFIDENTIAL

REPORT

by

SENEDD COMMISSIONER FOR STANDARDS

of the investigation of a referral by the Chief Executive and Clerk of the Senedd regarding the conduct of

JANET FINCH-SAUNDERS MS

Introduction

1. On 30 September 2025 the Chief Executive and Clerk of the Senedd (“the Complainant”), as required by section 9 of the National Assembly for Wales Commissioner for Standards Measure 2011 (“the Measure”), referred to me an allegation that Janet Finch-Saunders MS (“the Member” “*was attempting to get*” two of her support staff “*to do Conservative Party Connect Calling on Friday afternoons during their work time.*”¹
2. In compliance with section 9(b) of the Measure, I have considered that referral as a complaint and have investigated it in accordance with the [Procedure for Dealing with Complaints against Members of the Senedd](#) (“the Procedure”).
3. As required by paragraph 7.4(e) of the Procedure, links to the ‘complaint’ and all the evidence I relied upon in forming my opinion are in the Appendix. There are footnote references to the most relevant documents and hyperlinks are provided in the Appendix.

The investigation

4. Following receipt of the complaint I copied it to the Member and told her that I was undertaking a preliminary investigation to decide if it was one that I had power to investigate. To discover the identity of the individuals whose names had been redacted by the Complainant I served on her a Notice under sections 11 and 12 of the Measure. Before a response was received, I was contacted by [REDACTED] who had been informed that [REDACTED] email had been passed to me, asking when [REDACTED] name would be provided to the Member. I had a brief telephone conversation with [REDACTED] when I answered [REDACTED] question and outlined the procedure I would be following.
5. Having received the required information from the Complainant, I was satisfied I could investigate the matter. Amongst that information was an allegation that the Member had bullied her support staff.² I extended the scope of my investigation to include that alleged misconduct. I informed the Member and the Complainant of my decision and that I had started a full investigation. I outlined to the Member the process I intended to follow, reminded her of the support services available to her

¹ Document 24

² Document 45

STANDARDS CONFIDENTIAL

and asked her to provide me with details of any witnesses and any documents she believed to be relevant.

6. Over the following weeks the Member provided a large number of documents all of which are in the Appendix.³ She did not identify any potential witnesses.
7. During my investigation I interviewed under oath the Member and all the support staff who had been employed by her at her constituency office at the time of the alleged misconduct.⁴ I considered all the documents provided to me by [REDACTED] [REDACTED] and the Member.⁵
8. From the evidence of the staff, it became apparent that the Member may have broken Rule 24 of the Code of Conduct which requires Members to *“take reasonable measures to ensure their staff, when acting on their behalf, also uphold and act in accordance with these Rules and the Overarching Principles.”* The Member was told that I would be considering a potential breach of that provision.

Relevant provisions

9. The provisions most relevant to this investigation are the Code of Conduct for Members of the Senedd, the Guidance on the Code of Conduct for Members of the Senedd, the Rules and Guidance on the Use of Senedd Resources and the Procedure.
10. *Code of Conduct for Members of the Senedd*
Rule 1 of the Code provides –
Members must uphold the Overarching Principles.
One of these is Leadership. Paragraph 8 of the Code provides -
Members must promote and support these Principles by leadership and example and be willing to challenge poor behaviour wherever it occurs.
11. Rule 4 of the Code provides –
Members must not engage in unwanted behaviour, harassment, bullying or discrimination.
The meaning of these matters is set out in paragraph 10 of the Code in which it is provided that –
(1) *“bullying” means offensive, intimidating, malicious or insulting behaviour or an abuse of power in a way that intends to undermine, humiliate, criticise unfairly or injure someone, whether through persistent behaviour or a single grossly unacceptable act”.*

³ Documents 38 to 70

⁴ Documents 71, 36, 37 & 46

⁵ Documents 1 to 20, 23, 27, 38 to 62 and 65 to 70

STANDARDS CONFIDENTIAL

12. Rule 8 of the Code provides –
Members must comply with the rules made from time to time by the Clerk and Chief Executive of the Senedd as Principal Accounting Officer of the Senedd Commission on the use of resources provided to Members by the Senedd Commission.
13. Rule 24 of the Code provides –
Members must take reasonable measure to ensure that their staff, when acting on their behalf, also uphold and act in accordance with these Rules and the Overarching Principles.
14. *Guidance on the Code of Conduct for Members of the Senedd*
Paragraph 4 of the Guidance on the Code of Conduct for Members of the Senedd provides that although the Guidance is not enforceable the Standards Commissioner may have regard to it when considering complaints.

Paragraph 76 of that Guidance provides –
In particular, it may be noted that Members are accountable for the use of any resources made available to them, including use by any persons they allow to access such resources.
15. *Rules and Guidance on the Use of Senedd Resources*
The rules in force in the period covered by the investigation were the Rules and Guidance on the Use of Senedd Resources of 18 July 2022.
16. Paragraph 6 of the Rules and Guidance provides that although the Guidance set out after each Rule does not form part of the Rules the Standards Commissioner may have regard to it.
17. Paragraph 11 of the Rules and Guidance provides –
“Commission resources” – means any resource whether financial or otherwise provided to Members by the Commission either pursuant to section 27(5) of the Government of Wales Act 2006 (provision of property, staff and services to the Senedd) or in accordance with the Determination; and the Determination on Members’ Pay and Allowances: 2025-26 (Number Two).
18. Rule 1 of the Rules and Guidance provides –
Members are personally accountable for the use of Commission resources made available to them and must not use them for party political activity or for any purpose other than the discharge of their duties as a Member.
19. The Guidance to that Rule includes –
It is recognised that maintaining a strict separation between business that properly related to a Member’s duties and party political activity can sometimes be difficult. However, whilst this Rule is intended to be strictly observed, an incidental occurrence or reference to something party political during the otherwise proper conduct of a Member’s duties is unlikely to amount to a breach of this Rule.

STANDARDS CONFIDENTIAL

20. *Procedure for Dealing with Complaints against Members of the Senedd*
Paragraph 7(3) provides –
“If no representations are made, then the facts are deemed admitted.”

Facts established

21. As required by paragraph 7.1 of the Procedure I emailed the Complainant and the Member on 23 January allowing them until 2 February to submit written corrections or representations regarding the proposed findings of fact.⁶ In the email I quoted paragraph 7.3 of the Procedure. On 26 January the Complainant informed me that she had no written corrections or representations. The Member did not submit any written corrections or representations and so, in accordance with paragraph 7.3, is deemed to have admitted all the following facts that I had found established –

- I. Throughout the investigation the Member has denied any misconduct.⁷
- II. Witnesses [REDACTED] and [REDACTED] were employed by the Member as support staff and were paid for out of Senedd Commission funds.⁸
- III. Their respective start dates were in [REDACTED] and [REDACTED].⁹
- IV. [REDACTED]¹⁰
- V. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]¹¹
- VI. All three staff members were [REDACTED].¹²
- VII. The rent of the Member’s constituency office was paid out of funds provided by the Senedd Commission.¹³
- VIII. The ICT equipment/email account in the constituency office was provided by the Senedd Commission.¹⁴

⁶ Document 72

⁷ Documents 26, 29 & 71 page 3

⁸ Document 71 page 3

⁹ Document 71 page 3

¹⁰ Document 71 page 3

¹¹ Document 71 page 4

¹² Document 71 page 9

¹³ Document 71 page 4

¹⁴ Document 71 page 4

STANDARDS CONFIDENTIAL

- IX. The Member repeatedly caused or permitted ██████████ to carry out party political work in the constituency office during ██████ normal working hours.¹⁵
- X. On 23 June 2025 the Member sent an email to ██████████ reminding ██████ that ██████ was not permitted to carry out party political work during the working day or to use Senedd resources for party political work.¹⁶
- XI. Between 1 November 2024 and sending that email on 23 June the Member had been the sender, addressee or copy addressee of 17 party political emails to or from ██████████ all of which were considered by ██████ in the constituency office using Senedd provided ICT equipment/email account.¹⁷
- XII. Between sending that email on 23 June and 1 August 2025 the Member sent, was the addressee or copy addressee of 35 party political emails to or from ██████████ all of which were considered by ██████ in the constituency office using Senedd provided ICT equipment/email account.¹⁸
- XIII. These 52 party political emails concerned matters such as the design, ordering, proof reading, and printing of Welsh Conservative leaflets, surveys and banners and arrangements for the Welsh Conservative stall at the Anglesey Show.¹⁹
- XIV. In addition to these emails, ██████████ whilst working in the constituency office during normal work hours, took telephone calls from the Member instructing ██████ to carry out party political work.²⁰
- XV. Party political material including leaflets, banners, survey forms and envelopes was, with the Member's knowledge, kept in the constituency office. Usually, it was kept there for only a short time.²¹
- XVI. On 18 September 2024 the Member sent a WhatsApp message to ██████████ and ██████████ stating, "*Just checking bringing your own laptops for the 4.00 – 5.30 session on Friday.*"²²
- XVII. The purpose of that session, which did not take place, was to carry out Connect Calling, a form of telephone canvassing, in preparation for the Senedd elections in May 2026.²³
- XVIII. That the session was to take place in the Member's constituency office on 19 September 2025.²⁴

¹⁵ Documents 1 to 20, Document 36 pages 3 - 18, Document 46 pages 2 & 3; ██████████

¹⁶ Document 7

¹⁷ Documents 1 to 6; Document 36 pages 3 to 10

¹⁸ Documents 8 to 20; Document 36 pages 11 - 18

¹⁹ Documents 1 to 20

²⁰ Document 36 page 16

²¹ Documents 36 pages 7, 12, 15 & 17; Document 37 pages 4 to 7; Document 46 pages 3 to 5; Document 5

²² Document 27; Document 36 page 17 to 18; Document 37 pages 10 to 11; Document 46 pages 5 & 6

²³ Document 36 pages 17 to 18; Documents 37 pages 10 to 11; Document 46 pages 5 & 6

²⁴ Document 36 pages 17 to 18; Document 37 pages 10 to 11; Document 46 pages 5 & 6

STANDARDS CONFIDENTIAL

- XIX. During a Teams call with [REDACTED] and [REDACTED] on 24 September 2024 the Member told [REDACTED] that [REDACTED] should be working on her Welsh Conservative campaign plan for the Senedd election rather than carrying out case work in connection with her duties as a Member and that she was considering reducing [REDACTED] grade.²⁵
- XX. [REDACTED] was distressed by what the Member had said and offered [REDACTED] resignation which was accepted.²⁶
- XXI. [REDACTED] and [REDACTED] resigned shortly after the call on 24 September.²⁷
- XXII. All three staff members and left the Member's employment thereafter having served differing notice periods.²⁸
- XXIII. The Member never gave a specific instruction to [REDACTED] that the party political work referred to in the emails must be carried out in her constituency office during [REDACTED] normal work hours.²⁹

Consideration

22. In all aspects of the investigation there is a conflict between the evidence of the three former staff members and that of the Member. Referring to the account given by her former staff, the Member told me that *"This has been put together, I feel, over several weeks a little campaign, and they are obviously supporting [REDACTED] not me. I can't say any more than that, they've got their own reasons for doing this, but I just feel, em, oh this is at me."* She told me that she believed [REDACTED] blamed her for not getting the [REDACTED] and that [REDACTED] had ridiculed her for not being a Welsh speaker. However, none of the three staff members in fact made a complaint either to me or to anyone else. The matter came to my attention as a result of the referral by the Clerk of the Senedd. That referral was made because in an email to Members Business Support ("MBS") at the time of [REDACTED] resignation [REDACTED] had mentioned improper use of Senedd resources.³⁰ [REDACTED] had worked for the Member since [REDACTED]. According to the Member their generally good relationship began to deteriorate after [REDACTED] learning that [REDACTED].³¹ I reject that unsubstantiated proposition of the Member that the three staff members conspired to make these allegations against her. Although there were minor differences between their evidence, I was satisfied that they were trying their best to give an honest account of events. Given that they

²⁵ Documents 36 page 19; Document 46 page 7; Document 37 pages 8 to 9

²⁶ Documents 36 page 20; Document 46 pages 7 & 8

²⁷ Document 37 page 11; Document 46 page 8; Document 71 page 4

²⁸ Document 71 page 4

²⁹ Document 71 pages 9 & 13

³⁰ Document 45

³¹ Documents 66, 70 and 71 page 30 & 31

STANDARDS CONFIDENTIAL

were, at the time of the referral, all [REDACTED] there was no political advantage to be gained by fabricating evidence of misconduct by the Member. Further, much of the evidence of misconduct is in the emails about party political matters which the Member did not suggest were other than genuine. The Member had clear motive to be less than open about her conduct that occurred. Her answers to questions were on occasion, inconsistent. For example, she claimed initially that she read all her emails but later, after the number of party political emails had become clear to her, said that she had meant to say that she read all emails from constituents.³² She claimed, incorrectly that her WhatsApp message of 18 September (discussed below) did not specify 4:00 to 5:30 as the time of the proposed session.³³ And her repeated denials of ever having misused Senedd resources was manifestly untrue. I have had regard to these matters when evaluating the other evidence.

Rule 8 of the Code

23. There can be no doubt that between 12 November 2024 and August 2025 whilst in receipt of pay as one of the Member's support staff, [REDACTED] did, when working in her constituency office using ICT equipment/email account provided by the Senedd Commission for party political work on behalf of the Welsh Conservatives. The evidence for that is to be found in the 52 emails and the testimony of [REDACTED] and the Member herself. These emails were about party political matters and almost all of them were either sent by the Member, sent to the Member or copied to her.³⁴
24. The Member's evidence is that she was until 23 June 2025 unaware of this admittedly improper use of Senedd resources. According to the Member, as soon as she became aware of the misconduct she reprimanded [REDACTED] and told [REDACTED] that there must be no repetition.³⁵
25. I do not accept the Member's evidence that she was unaware of this misconduct prior to 23 June. In her email of 12 January 2026, she stated "*Have always opened all my emails and simply forwarded on any requests.*"³⁶ At the start of her evidence on 14 January the Member told me that she was a person who paid attention to detail. When asked if she opened and read all her emails she responded "*I do. I always opened my own inbox and then I delegate work out to different staff, depending on what the issue is.*"³⁷ Later, after many of the documents had been put to her, she changed her evidence saying that "*I meant my constituent emails.*"³⁸ The Member also told me that she expected all her staff to open and read emails they received. Of the 18 party political emails sent by, received by or copied to [REDACTED] prior to 23 June, one was sent by the Member and she was the principal addressee of another three. She was a copy addressee of a further eight. I find it

³² Document 71 page 22

³³ Document 71 pages 24 & 25

³⁴ Documents 1 to 20

³⁵ Document 7 & 71 pages 14 & 37

³⁶ Document 64

³⁷ Document 71 page 3

³⁸ Document 71 page 22

STANDARDS CONFIDENTIAL

inconceivable that she was not well aware that [REDACTED] was, whilst employed in her constituency office, sending, receiving and actioning emails about party political matter using ICT equipment/email account provided by the Senedd Commission.

26. The email of 23 June from the Member to [REDACTED] is curious.³⁹ In it she reprimanded [REDACTED] for engaging in party political work in connection with the Welsh Conservatives stall at the Anglesey Show and told [REDACTED] there must be no repetition. Just seven days earlier she emailed the then Chair of North West Wales Conservatives in relation to the Show saying ‘[REDACTED] is enquiring about the associated costs today.’⁴⁰ The following day [REDACTED] provided the costs to which the Member responded ‘Very reasonable if I may say so.’⁴¹ On 18 June [REDACTED] sent two emails to the Member with further information about the costs and the availability of a stall at the Show.⁴² All these emails were sent or received by [REDACTED] in the constituency office during work time using Senedd provided ICT equipment/email account. I am satisfied that the Member knew about the party political work being undertaken by [REDACTED] in connection with the Anglesey Show several days before she reprimanded [REDACTED]. It is not necessary for me to express a view on why the email reprimand was sent by the Member but I do not discount the explanation given by [REDACTED] ‘that email she sent me reprimanding me is part of what she would maybe consider a process of protecting her own self-interest, so should there ever be an investigation into whether she’s making staff assist her with political activity she could always refer to such email as evidence that she reprimanded the staff, it was the staff’s fault’⁴³
27. Between 23 June and 14 August 2025, the Member sent five emails to [REDACTED] either as a principal or copy addressee. She received, either as the principal or a copy addressee 13 emails from [REDACTED]. All these emails were party political in nature and were sent or received by [REDACTED] in the Member’s constituency office using ICT equipment/email account/email account provided by the Senedd Commission and whilst [REDACTED] was being paid as one of the Member’s support staff. At interview it was put to the Member that after 23 June there was substantial evidence that she was copied into lots of party political emails from [REDACTED]. She responded ‘Well, I accept that – I, I genuinely you know ... I focus on my constituents’ emails coming in.’⁴⁴ On 25 June, despite the reprimand given two days earlier, the Member copied to [REDACTED] an email to the Welsh Conservative Group Office about photographs for a Welsh Conservatives poster.⁴⁵ That casts further doubt on the motive for sending the email of 23 June. On 2 July she copied to [REDACTED] an email to the Welsh Conservatives Group Office about Welsh Conservatives roll-up banners.⁴⁶ On 25 July, far from ensuring that [REDACTED] complied with the rules, the Member emailed [REDACTED] at [REDACTED] Senedd email address

³⁹ Document 7

⁴⁰ Document 6

⁴¹ Document 6

⁴² Document 6

⁴³ Document 36 pages 12 to 13

⁴⁴ Document 71 page 37

⁴⁵ Document

⁴⁶ Document 8

STANDARDS CONFIDENTIAL

instructing [REDACTED] to order 5000 prepaid envelopes for Wesh Conservative use.⁴⁷ When asked why she had sent that party political email to [REDACTED] at [REDACTED] place of work the Member replied *“Especially after I told [REDACTED] Yes, I have no idea. I cannot comment on that.”*⁴⁸ The Member accepted that she had taken no action in respect of this improper use of Senedd resources. Nor did she take any action in respect of the email she received from [REDACTED] the 10 emails from [REDACTED] to third parties but copied to her, the nine emails from third parties to both her and [REDACTED] the five emails from third parties to [REDACTED] but copied to her or the two emails from third parties to both of them dated after the reprimand email. All these emails were related to Welsh Conservative matters and not the Member’s duties as a Member of the Senedd. They were all sent or received by [REDACTED] whilst in her constituency office using ICT equipment/email account provided by the Senedd for her use as a Member whilst [REDACTED] was being paid as one of her support staff.

28. [REDACTED] [REDACTED] and [REDACTED] all gave evidence that the Member’s office was used to store Welsh Conservative material including leaflets, banners, survey forms and envelopes.⁴⁹ The email of 11 March 2025 from a firm of printers to [REDACTED] about Welsh Conservatives survey forms which was copied to the Member supports their evidence. In it the printer writes *“Thank you for your order and comments duly notes regarding invoice details. I will pass the artwork through to production and have them delivered to your office.”* (emphasis added).⁵⁰ [REDACTED] confirmed that the survey forms had been delivered to the constituency office. The Member denied that any such misconduct had taken place. She provided me with screenshots of recently taken photographs showing the storage arrangements at her political office and in a barn where she said all Welsh Conservative material was kept.⁵¹ I do not doubt the authenticity of these screenshots, but they showed only where the material shown in them was stored at the time the photographs they were taken. Furthermore, the Member told me that during term time she was normally in her constituency office only on Fridays and so cannot have had any direct knowledge of what took place when she was not present.⁵² Even when she was present, I doubt that checking what materials were in the office was a top priority. She claimed that [REDACTED] may have been confused about what was party political material and what was material connected with the Member’s duties.⁵³ I reject that assertion. [REDACTED] gave evidence that although [REDACTED] did not receive any instruction about the distinction when starting work for the Member *“I was aware of the difference anyway. Politics is something I follow closely. I’ve worked for a Member of Parliament, so I’m aware of the difference and the nuances between the two.”*⁵⁴
29. There was evidence from [REDACTED] and [REDACTED] that they staffed the Welsh Conservatives stall on the first day of the Anglesey Show. Whilst [REDACTED] [REDACTED] took annual leave [REDACTED] did not and so was carrying out party

⁴⁷ Documents 12 & 13

⁴⁸ Document 71 page 19

⁴⁹ Documents 36 pages 7, 12, 15 & 17; Document 37 pages 4 to 7; Document 46 pages 3 to 5

⁵⁰ Document 5

⁵¹ Documents 52, 54 & 57

⁵² Document 71 page 4; Document 36 page 2

⁵³ Document 71 pages 28 & 29

⁵⁴ Document 37 page 3

STANDARDS CONFIDENTIAL

political work whilst in receipt of pay as one of the Member's staff. When questioned about this the Member said that that completion of the leave sheets for [REDACTED] [REDACTED] was done by [REDACTED] and that she "didn't feel I would have a need" to check that annual leave had been taken.⁵⁵ I find that surprising and reprehensible given that only a few days earlier she had reprimanded [REDACTED] for breaking the rules on the use of Senedd resources. The attendance of [REDACTED] at the show to staff a Welsh Conservatives stall whilst being paid as a member of support staff was a breach of Rule 1 of the Resource Rules.

30. I accept the evidence of [REDACTED] that whilst working in the constituency office [REDACTED] received telephone calls from the Member about Welsh Conservative matters. Whilst that was denied by the Member during her interview, as she did not dispute my finding with regard to it, the misconduct is deemed to have been admitted. I would, in any event, have considered [REDACTED] account to be the more probable.
31. Whilst I accepted the Member's evidence that she never gave a specific instruction to [REDACTED] that the party political work referred to in the emails must be carried out in her constituency office during [REDACTED] normal work hours I attach little weight to it. From the times at which the emails were sent to [REDACTED], the Member must have known that they would be read, and where appropriate actioned, by [REDACTED] in her constituency office using Senedd provided ICT equipment/email account.
32. I am satisfied that the Member used Senedd resources including [REDACTED] her constituency office and the ICT equipment/email account there for party political purposes. By doing so she contravened Rule 1 of the Rules and Guidance on the Use of Senedd Resources and so Rule 8 of the Code of Conduct for Members of the Senedd. The Guidance to that Rule provides "*an incidental occurrence or reference to something party political during the otherwise proper conduct of a Member's duties is unlikely to amount to a breach of this Rule.*" I am satisfied that the party political use which I have found established and which the Member is deemed to have admitted cannot properly be regarded as incidental.
33. Even if it had been the case that she was unaware of the political activity of [REDACTED] [REDACTED] I would still have been of the opinion that she had breached Rule 8 because, as made clear by paragraph 76 of that Guidance on the Code of Conduct for Members of the Senedd, Members are "*accountable for the use of any resources made available to them, including use by any persons they allow to access such resources.*"

Rule 24 of the Code

34. The Member has acknowledged that she was fully aware of the restrictions on the use of Senedd resources including her support staff, her constituency office and the ICT equipment/email account in it.⁵⁶ The only measure taken by her, even on her view of it which I do not accept, to ensure that [REDACTED] abided by the rules

⁵⁵ Document 71 page 23

⁵⁶ Document 71 page 2 & 3

STANDARDS CONFIDENTIAL

regarding the use of Senedd resources was her email of 23 June. Prior to that email she sent [REDACTED] emails about party political matters whilst [REDACTED] was in her office and was the addressee or copy addressee of other such emails from [REDACTED]. Even after she had, on her account, discovered that [REDACTED] had broken the rules she on her own admission did nothing to prevent further breaches. When asked what measures she had taken to ensure that [REDACTED] did not continue to misuse Senedd resources she responded *"I think it's fair to say I haven't taken any measures, and that I have not picked up on where [REDACTED] continued to do it"*⁵⁷

35. On 18 September 2025 she sent a WhatsApp message to [REDACTED] and [REDACTED] stating *"Just checking bringing your own laptops for the 4:00 to 5:30 session on Friday."*⁵⁸ According to the Member this session was to be in two parts. The first was to be about the use of VoteSource was to take place in the constituency office which, she said, would have been a proper use of resources. The second part was to have taken place in TAPPS and was to be a training session on Connect Calling. That would have been a breach of the resource rules if undertaken in the constituency office.⁵⁹ TAPPS is a micropub in Llandudno. Connect Calling is a Conservative Party political canvassing platform.
36. All three staff Members gave a different account which cannot be reconciled with that given by the Member. [REDACTED] and [REDACTED] were clear that the session was to take place in the constituency office and that the intention was to carry out Connect Calling, a party political activity. They were asked to bring their own laptops so that there would be no trace of this improper activity having taken place. Although [REDACTED] was not invited to take part ([REDACTED] [REDACTED] [REDACTED] was a member of the WhatsApp⁶⁰ group and saw the message. [REDACTED] told me that *"It seemed abundantly clear to me that it was intended to take place in the constituency office."*⁶¹
37. I consider the Member's version improbable and am satisfied on the balance of probabilities that the version of the three staff members is to be preferred.
38. Although the session did not take place, proposing it was inconsistent with the Member's duty to take reasonable measures to ensure her staff when acting on her behalf also upheld and acted in accordance with the provisions of the Code of Conduct.

Rule 4 of the Code

39. There is no doubt that on 24 September 2024 there was a remote meeting between the Member, [REDACTED] and [REDACTED] at which [REDACTED] resigned. Nor is there any doubt that the meeting became acrimonious. There are, however,

⁵⁷ Document 71 page 39

⁵⁸ Document 27

⁵⁹ Document 71 pages 24 to 28

⁶⁰ Document 36 page 17 to 18; Document 37 pages 10 to 11; Document 46 pages 5 & 6

⁶¹ Document 37 page 11

STANDARDS CONFIDENTIAL

differing accounts of what took place prior to the resignation. [REDACTED] was clear that the Member was concerned about the amount of time [REDACTED] was spending on case work rather than preparing her election campaign and that she said that she was considering reducing [REDACTED] grade to enable her to employ more staff. That evidence was, in the main, supported by [REDACTED]. The Member gave a different account. According to her, [REDACTED] accused her of asking [REDACTED] to carry out party political work and she responded that she had never done so. [REDACTED] was very rude to her. It was [REDACTED] who first mentioned a reduction in grade and that when she asked what [REDACTED] was talking about [REDACTED] "threw [REDACTED] arms up in the air" and said "Oh, I just resign anyway. "Although I believe the version of [REDACTED] [REDACTED] the more probable, I do not consider that what [REDACTED] said took place on this single occasion although it caused [REDACTED] distress, amounted to bullying.⁶²

40. [REDACTED] evidence in relation to bullying centred on the Member allegedly asking [REDACTED] constantly to take part in party political work at weekends despite being aware that family commitments prevented [REDACTED] from doing so.⁶³ The Member's evidence was that these requests were to members of a [REDACTED] [REDACTED] group of which [REDACTED] was, as a [REDACTED] [REDACTED] a member. That evidence was given after I had interviewed [REDACTED] [REDACTED] I decided against delaying the investigation to re-interview [REDACTED] [REDACTED] as I was not satisfied that her allegation could, if proved, amount to a breach of Rule 4.
41. [REDACTED] described the Member as a bully in [REDACTED] email to MBS of 29 September.⁶⁴ In [REDACTED] evidence [REDACTED] described her management style as horrendous and said that one of the reasons [REDACTED] resigned was because she was so difficult and so rude. [REDACTED] evidence was, however, unspecific and the one example [REDACTED] gave could not, in my opinion, even if proved amount to bullying.
42. I considered whether the taking the evidence of all three witnesses together there was evidence of a breach of Rule 4. It was clear from that evidence that the Member expected high standards from her staff and made numerous demands on their time. By her own admission, she was "direct" in her dealings with her staff. She denied making unreasonable demands or being rude to her staff.⁶⁵
43. Having considered all the evidence I am not satisfied that the Member's conduct amounted to bullying or a breach of any other part of Rule 4 of the Code.

Rule 1 of the Code

44. The Leadership Principle included in Rule requires Members "*to promote and support these Principles by leadership and example, and be willing to challenge poor behaviour wherever it occurs.*"

⁶² Document 71 pages 29 to 35; Document 36 pages 19 & 20; Document 46 pages 7 & 8

⁶³ Document 46 pages 5 to 7

⁶⁴ Document 45 pages 10 & 11

⁶⁵ Document 71 pages 36 & 37

STANDARDS CONFIDENTIAL

45. The Member is a very experienced politician and a Senedd Commissioner. As such it was particularly incumbent on her to set an example for her staff, other Members and the public. By condoning and on occasion instigating the persistent use of Senedd resources for party political purposes the Member manifestly failed to give that leadership and so breached Rule 1 of the Code of Conduct.

Opinion

46. It is my opinion that the Member breached Rules 1, 8 and 24 of the Code of Conduct for Members of the Senedd.

Douglas Bain CBE TD

Senedd Commissioner for Standards
12 February 2026

STANDARDS CONFIDENTIAL

APPENDIX

In accordance with paragraph 7.5 of the Procedure this appendix contains the referral by the Clerk of the Senedd and all evidence obtained as part of the investigation and relied upon in forming my opinion. It also includes all documents furnished by the Member.

To preserve the integrity of the document numbers used during the interviews those documents included in the interview bundle but not relied upon in forming my opinion are shown as 'Not allocated.'

<i>Document</i>	<i>Description</i>
1	Emails re placing order for banner
2	Screenshot - banner
3	Emails re design request
4	Screenshot – survey form
5	Emails re placing order for survey forms
6	Emails re ██████████ (Part 1)
7	Emails re ██████████ (Part 2)
8	Emails re proof reading of banners
9	Screenshot – banner (English)
10	Screenshot – banner (Welsh)
11	Email re order for pull-up banner
12	Emails re ordering envelopes
13	Screenshot – freepost envelope
14	Email re ordering envelopes
15	Emails re proof reading of policy flyer
16	Screenshots – policy flyer
17	Emails re order for survey forms
18	Emails re design and proof reading of banner
19	Screenshot - banner
20	Emails re placing order for banner
21	Not allocated
22	Not allocated
23	Emails ██████████ – Member - resignation
24	Referral
25	Letter Commissioner to Member covering referral
26	Email Member to Commissioner denying allegations
27	Email ██████████ – Commissioner and screenshot WhatsApp proposed connect calling session
28	Email ██████████ – Commissioner with emails Member- ██████████ attached
29	Email Member – Commissioner denying allegations
30	Not allocated
31	Letter Commissioner – Member – referral admissible
32	Letter Commissioner – Member – seeking any evidence

STANDARDS CONFIDENTIAL

33	Not allocated
34	Email Member – Commissioner and emails re [REDACTED]
35	Email Member – Commissioner acknowledging receipt of evidence bundle
36	Transcript – [REDACTED]
37	Transcript – [REDACTED]
38	Screenshot -Survey Conwy Valley Railway Line
39	Screenshot - Survey
40	Screenshot – Surveys Bangor Conwy Mon
41	Screenshot – Freepost envelope
42	Screenshot – Constituency leaflet
43	Email Gentry – Member re helpers list
44	Email [REDACTED] – Millar -resignation from Welsh Conservatives
45	Email [REDACTED] – HR and Member
46	Transcript – [REDACTED]
47	Email Member – Commissioner 12 January 2026
48	Email Member – Commissioner 12 January 2026
49	Screenshot - leafletting
50	Email [REDACTED] – Miller -resignation from Welsh Conservatives
51	Email Member – HR 15 May 2025 re [REDACTED]
52	Screenshot – leaflet storage at Member’s home
53	Email member – Commissioner re [REDACTED] photos
54	Screenshot – leaflet storage at Member’s home
55	Screenshot - leafletting
56	Screenshot - leafletting
57	Screenshot – leaflet storage at barn
58	Screenshot - leafletting
59	Screenshot leafletting
60	Screenshot – Senedd stand
61	Screenshot - poster
62	Screenshot – [REDACTED] campaigning
63	Email Member – Commissioner re WhatsApp group
64	Email Member – Commissioner & newsletter
65	Member’s recess visits and meetings
66	Screenshot – [REDACTED] Christmas card
67	Screenshot – [REDACTED] WhatsApp
68	Screenshot – [REDACTED] WhatsApp
69	Screenshot – WhatsApp staff leaving campaign group
70	Screenshot – Member and [REDACTED] leafletting
71	Transcript - Member
72	Letter Commissioner – Member 23 January 2026