

Senedd Commissioner for Standards Annual Report

April 2025 – March 2026

UPHOLDING
REPUTATIONS



SAFEGUARDING
STANDARDS



ADDRESSING
CONCERNS



The Senedd Commissioner for Standards is an independent person appointed by the Welsh Parliament, to safeguard standards, to uphold reputations, and to address your concerns.



Douglas Bain CBE TD
Senedd Commissioner for Standards

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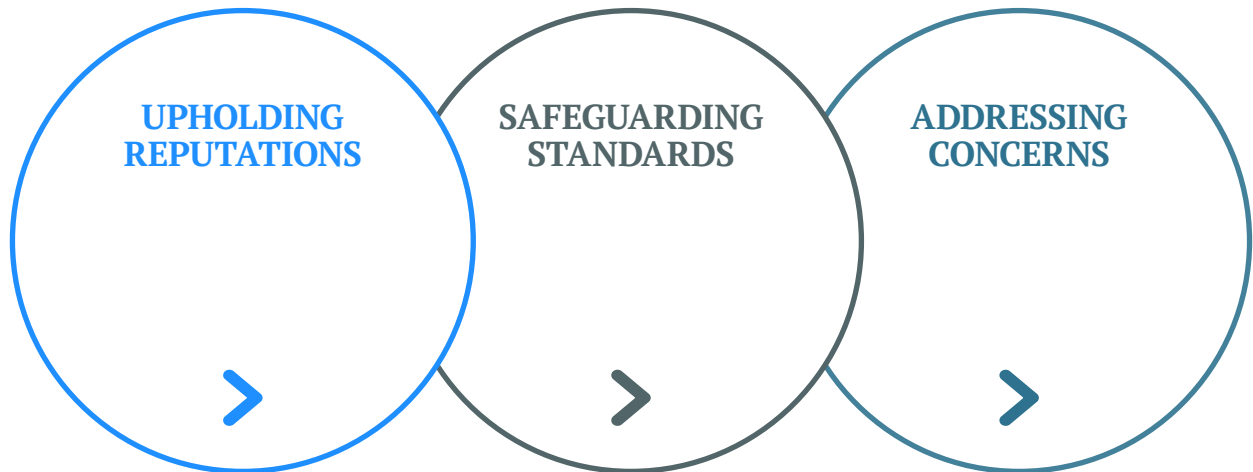
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1. Introduction

1. This is my sixth and last annual report as Senedd Commissioner for Standards. My period in office ends on 31 March 2027 and responsibility for the report for 2026-27 will fall to be successor. The report outlines how I performed the functions of my office during the year ended 31 March 2026.

2. It follows the same pattern as my previous reports. After setting out the relevant statutory provisions it gives information on the number and subject matter of complaints received and how they were processed. Information is also given on other work undertaken during the year, the expenditure of the Commissioner's office and what is planned for 2026-27.

2. Functions and duties of the Commissioner

3. As the Senedd Cymru (Member Accountability and Elections) Bill had not received Royal Assent by the year-end there were no changes to the functions and duties of the Commissioner during the reporting year.¹ The office of Senedd Commissioner for Standards was created by section 1(1) of the National Assembly for Wales Commissioner for Standards Measure 2009 ('the Measure').² Section 5 of the Measure provides for the independence of the Commissioner from the direction or control of the Senedd.

4. The functions of the Commissioner are set out in sections 6 and 7 of the Measure and may be summarised as being –

- To receive any complaint that a Member has failed to comply with a requirement of the Code of Conduct³ (the Code') or other relevant provision and to investigate and report to the Standards of Conduct Committee ("the Committee") on those that are admissible;⁴
- To advise Members and members of the public on the process for making and investigating complaints;
- To give advice to the Senedd on any matter of general principle relating to the standards of conduct of Members, the procedure for investigating complaints or any other matter relating to promoting, encouraging and safeguarding high standards of conduct in the public office of Member of the Senedd.

¹ Royal Assent was given on 27 April 2026

² <http://www.legislation.gov.uk/mwa/2009/4/contents>;
<http://www.legislation.gov.uk/mwa/2009/4/contents/enacted/welsh>

The title of the post was changed from National Assembly for Wales Commissioner for Standards by the coming into effect of section 7 of the Senedd and Elections (Wales) Act 2020 on 6 May 2020.

³ <https://senedd.wales/media/pdyeuznd/coc-on-template-e-revised-260318.pdf>

⁴ As defined in section 6(3) of the Measure.

5. Section 19 of the Measure requires the Commissioner, as soon as possible after the end of each financial year, to submit a report to the Senedd on how the functions of the Commissioner have been exercised during that year.

3. Complaints

Introduction

6. By far the greater part of my time during the year was spent dealing with complaints against Members of the Senedd. Further information about them is set out in the following paragraphs.

Complaints carried forward from 2024-25

7. Consideration of 12 admissible complaints was underway at the start of the current year. Reports of four investigations, covering eight of these complaints, were submitted to the Committee by September 2025. Consideration of the other four complaints, which repeated substantially allegations dealt with in the reports submitted, was discontinued.^{5 6 7 8}

New complaints

8. During the year 86 new complaints were received. All these complaints were dealt with in accordance with the **Procedure for Dealing with Complaints against Members of the Senedd (“the Procedure”)**.

9. The sources, subject matter and reasons for inadmissibility of these complaints is shown in the following Tables.

⁵ **Twenty fourth report to the Sixth Senedd under Standing Order 22.9**

⁶ **Twenty second report to the Sixth Senedd under Standing Order 22.9**

⁷ **Twenty first report to the Sixth Senedd under Standing Order 22.9**

⁸ **Twenty third report to the Sixth Senedd under Standing Order 22.9**

Table 1: Complaints received, source and admissibility

	2021-22	2022-23	2023-24	2024-25	2025-26
Received	44	71	190	136	86
% by Public	91	58	89	92	86
% by Member against Member	0	0	0.5	2	4
% by Member against self	0	7	1.5	1	1
% by Clerk of the Senedd	9	35	9	5	9
% not admissible	80	49	84	82	83
% admissibility not decided by year end	5	0	1	3	2

Table 2: Complaints by subject matter

	2021-22	2022-23	2023-24	2024-25	2025-26
Conduct on social media	6	8	53	44	21
Misuse of resources	4	5	3	5	12
Standard of service	16	5	17	15	9
Failure to register/declare/update an interest	7	27	24	12	12
Outside remit (conduct in plenary or Ministerial conduct)	3	20	29	22	18
Other conduct⁹	8	6	64	38	14
TOTAL	44	71	190	136	86

⁹ Complaints are received in many different areas and this section has included complaints ranging from the attendance of some Members at a demonstration to the way some Members vote remotely during Plenary. Other subjects complained about included Welsh Government policies and the Welsh Government as an organisation.

Table 3: Reasons for inadmissibility

Reason number	Descriptor	2021-22	2022-23	2023-24	2024-25	2025-26
1	Not in writing (Procedure sub-paragraph 4.2(a))	0	0	0	0	0
2	Complainant not named (Procedure sub-paragraph 4.2(b))	0	0	0	0	1
3	Not about conduct of a named Member (Procedure sub-paragraph 4.2(c))	2	0	9	1	2
4	Act or omission complained of not stated (Procedure paragraph 4.2(d))	33	1	9	2	0
5	Insufficient supporting evidence (Procedure sub-paragraph 4.2 (e)(i)) ¹⁰	-	3	40	22	14
6	Conduct, if proved, not a breach of relevant provision (Procedure sub-paragraph 4.2(e)(ii))					
	Conduct in plenary or Committee (Code paragraph 3) ¹¹	-	13	17	12	17

¹⁰ Where Complainants initially fails to provide sufficient evidence or information to support a potentially admissible complaint, they are allowed at least 14 days to provide it.

¹¹ Paragraph 3 of the Code provides that the conduct of Members during plenary sessions of the Senedd and in committees is normally dealt with by the Llywydd and the chairs of committees through the application of Senedd Standing Orders. The Commissioner may investigate a

Reason number	Descriptor	2021-22	2022-23	2023-24	2024-25	2025-26
	Ministerial Conduct (Code paragraph 7(ii)) ¹²	-	7	12	10	2
	Standard of service (Code paragraph 7(iii)) ¹³	-	4	17	27	9
	Other	-	7	54	35	24
7	Not within period allowed (Procedure sub-paragraph 4.2(g))	0	0	1	2	2

10. Of the 13 admissible complaints, six related to minor failures by Members to notify a change to their registered interests within the time allowed under Standing Orders. In five of these complaints, as the Members accepted their error and had rectified it, I recommended to the Committee that I should not continue my investigation. All these recommendations were accepted. Consideration of the sixth complaint was discontinued as the failure had already been considered by the Committee.

11. The Chief Executive referred to me four instances of Members allegedly making party political films on the Senedd estate. Such filming is prohibited under the Rules and Guidance on the Use of Senedd Resources and is a breach of Rule 8 of the Code. The two Members concerned admitted their misconduct and deleted the content. The Committee accepted my recommendation that consideration of the complaints should be discontinued..

complaint of such conduct only if it is referred for investigation by the Llywydd or the committee chair.

¹² Section 8 of the Measure and paragraph 7(ii) of the Code make clear that the Commissioner has no role in relation to complaints of alleged misconduct by Members when acting exclusively in their Ministerial capacity. The complainants who alleged ministerial misconduct were directed to the office of the First Minister.

¹³ Paragraph 7(iii) of the Code provides that it does not apply in relation to the standard of service and outcomes received from a Member.

12. One complaint was about an alleged failure to declare an interest during Plenary. During my investigation it became clear that there had been no such failure. I ended my consideration of the complaint in accordance with sub-paragraph 5.1 of the Procedure.

13. I investigated a referral by the Chief Executive of the alleged improper use of one of her support staff by Janet Finch-Saunders. During my investigation, it became apparent that not only had the Member repeatedly acquiesced, and on some occasions instigated, this misconduct but that she had also failed to provide adequate training for her staff.. The Committee accepted my opinion that the Member had breached Rule 1 (Leadership), Rule 8 (Improper use of Senedd resources) and Rule 24 (Duty to provide training etc) of the Code. The Member was censured for her misconduct.¹⁴

14. My investigation of the thirteenth admissible complaint was ongoing at the year-end.

Complaints carried forward to 2026-27

15. At the year-end the admissibility of two complaints received on 31 March 2026 had still to be determined and my investigation of one admissible complaint was ongoing.¹⁵

Consideration

16. I am satisfied that overall the conduct of Members continues to be of a high standard. That is vouched by the 37% per cent reduction in the number of complaints received and by the fact that, apart from the minor and largely technical failures, only one Member, Janet Finch-Saunders was found to have breached any relevant provision during the year.

17. The reduction in the number of complaints received from 136 in 2024-25 to 86 in the reporting year was the second largest reduction since the creation of the Standards Commissioner in 2009. It continues an encouraging trend in a reduction in the number of complaints received.

¹⁴ **Twenty fifth report to the Sixth Senedd under Standing Order 22.9**

¹⁵ The investigation was brought to an end under sub-paragraph 5.1(a) & (g) of the Procedure. One of the complaints was found to be inadmissible in accordance with sub-paragraph 4.2(f) whilst consideration of the other complaint was brought to an end under sub-paragraph 5.1(g)

18. Although conduct on social media continued to be the largest single reason for complaints it was pleasing to note the more than 50 per cent reduction in the number since 2024-25. There was no significant changes to the subject matters about which other complaints were made or in the sources of complaints or the reasons why they were not admissible.

4. Other work

19. When considering complaints I once again identified several areas in which improvements could be made to the Code and the Procedure. I was pleased to note that many of these have been actioned in the Code of Conduct which came into force at the commencement of the Seventh Senedd.

20. I gave evidence to the Committee on the Senedd Cymru (Member Accountability and Elections) Bill and to the Standards Committee on that Bill and a number of other matters. I contributed to the Independent Remuneration Board's consultation on the Determination for the Seventh Senedd.

21. During the year I received correspondence on a wide range of matters outside my remit as Commissioner. In each case it was explained to the person why I could not assist them and they were sign-posted to the appropriate organisation to deal with their issue.

5. Expenditure

22. Under section 3 and paragraph 5 of the Schedule to the Measure, the Senedd Commission must pay to the Commissioner the salary and allowances agreed in the terms and conditions of appointment. The Commission must also pay all reasonable expenses lawfully incurred by the Commissioner in employing staff, securing the provision of goods or services, and paying allowances or expenses to witnesses.

23. The expenditure by the Commissioner's office for the year ended 31 March 2025 is shown in Table 4.

Table 4 - Expenditure of Commissioner's office

	2021-22 £	2022-23 £	2023-24 £	2024-25 £	2025-26 £
Commissioner employment costs (Note 1)	30,538	34,692	48,847	39,137	35,720
Commissioner T & S	1,014	4,264	5,199	24	811
Commissioner other costs	0	0	0	0	0
Acting Commissioner employment costs (Note 1)	0	0	0	2,940	0
Acting Commissioner T & S	0	0	0	0	0
Acting Commissioner other costs	0	0	0	0	0
Total Commissioner and Acting Commissioner expenditure	31,552	38,955	54,045	42,101	36,531

	2021-22 £	2022-23 £	2023-24 £	2024-25 £	2025-26 £
Employment costs (Note 2)	70,874	71,115	74,448	75,848	64,626
Staff T & S	0	0	0	520	39
Staff other costs	0	0	0	0	0
Total Staff costs (Note 3)	70,874	71,115	74,448	76,368	64,665
Other liabilities incurred¹⁶	4,957	9,524	5,498	8,555	4,117
TOTAL COMMISSIONER OFFICE EXPENDITURE	107,383	119,595	133,992	127,025	105,213

Note 1 - Commissioner remuneration + employer NIC

Note 2 - Staff salary + employer NIC + employer pension contribution

Note 3 – The reduction is because the person concerned spent only approximately 80% of total time supporting the Commissioner. No equivalent adjustment was made in previous years

24. The cost of running the Commissioner's office depends very largely on the number of complaints received and how many of them are admissible and so require investigation. Whilst the number of complaints received in 2025-26 was 50 less than the previous year, four formal investigations regarding complaints received during 2024-25 were carried over and undertaken during the 2025-26 reporting year and one new formal investigation was undertaken. Such formal

¹⁶ This included payments for legal services, transcription, media handling

investigations take up significantly more time and resource than inadmissible complaints. Even without the reduction due to the more accurate method of calculating Employment costs the total expenditure was 4% lower than the previous year and the lowest since 2022-23.

6. The year ahead

25. I expect 2026-27 to be a busy year. The increase in the number of Members and the fact that a very high proportion of them have not previously been Members will almost certainly result in a significant increase in the number of complaints received.

26. Whilst the new Code of Conduct addresses many of the deficiencies in the previous Code it is likely that some of the new measures will give rise to time consuming issues.

27. I shall work with the Committee on the revision of the Procedure. That revision is necessary to rectify a number of minor deficiencies identified and as a consequence of the changes to the Code.

28. Work will be undertaken to adjust current practice to take account of the changes made by the Senedd Cymru (Member Accountability and Elections) Act 2026.

29. If invited, I shall meet with the new Standards Committee to explain my role and brief them on my work. I shall do the same for lay members when they are appointed to the Committee.

30. I shall build on the induction sessions for Members on my role and the complaints process delivered in May 2026 by providing further sessions later in the year.

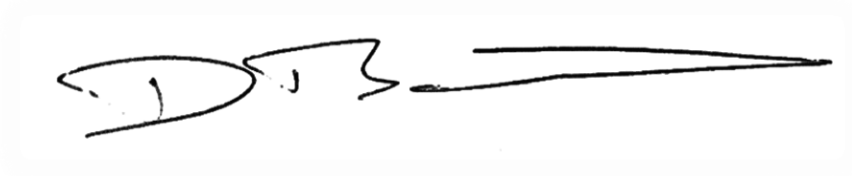
31. In light of the Welsh Government's commitment to bring the office of the Senedd Commissioner for Standards within the remit of the Welsh Language Commissioner I shall liaise with that office on the standards that would be appropriate.

32. I shall continue to liaise with those undertaking similar work in other jurisdictions with a view to identifying and introducing best practice.

33. I shall meet with my successor to ensure a smooth handover of any ongoing investigations and other work.

7. Acknowledgements

34. Jonathan Thomas, my Investigations and Complaints Manager, again fully utilised his more than 16 years of experience of supporting every Standards Commissioner since the post was created in 2009. I am indebted to him for all he has done. I am most grateful also to Meriel Singleton, the Clerk to the Standards of Conduct Committee and to the many other Senedd Commission staff who helped me to discharge my duties.

A handwritten signature in black ink, appearing to read 'Douglas Bain', written on a light grey background.

Douglas Bain CBE TD

Senedd Commissioner for Standards

18 June 2026





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