



Llywodraeth Cynulliad Cymru  
Welsh Assembly Government

**By fax**

Miss E M Bronwen Morgan  
Director  
Corporate and Legal  
Services Department  
Ceredigion County Council  
Neuadd Cyngor Ceredigion  
Penmorfa  
ABERAERON  
SA46 0PA

Eich cyf \* Your ref  
Ein cyf \* Our ref A-LGM-21-02-008

21 September 2006

Dear Bronwen

**STANDARDS COMMITTEE CONFERENCE – 22 SEPTEMBER 2006  
REVIEW OF CODE OF CONDUCT**

I am very sorry that I am unable to attend tomorrow's conference, but as I have explained previously I have an unavoidable personal matter to attend to. Please convey my sincere apologies to those attending the conference.

I am sure that colleagues would be interested in a brief update on the current position with the review of the code of conduct. There was a very good response to the consultation exercise, with over 80 responses received. Unfortunately, other internal Assembly pressures and priorities have meant that a detailed analysis of the responses has yet to be completed, though initial scrutiny suggests that there is widespread support for the broad thrust of the proposals put forward by the review group. As might be expected, there are mixed views on some aspects of the proposals. To give a flavour of those, they include:

- The practicalities of extending and enforcing the requirement to disclose interests to a wider range of circumstances when members might be able to influence decisions eg telephone conversations and correspondence.
- Whether the provisions of the code should apply to political group meetings and issues around policing that.
- Issues around the disclosure of confidential information, eg whether breaches of the code should be limited to circumstances where the information disclosed is confidential in law. Also, whether there should be an explicit "public interest defence" to disclosure.



BUDDSODDWR MEWN POBL  
INVESTOR IN PEOPLE

Parc Cathays • Cathays Park  
Caerdydd • Cardiff  
CF10 3NQ

Ffôn \* Tel 029 2082 6414  
Ffacs \* Fax 029 2082 5346  
stephen.phipps@wales.gsi.gov.uk  
GTN: 1208 6414

- The extent to which conduct in private life should have a bearing on a member's public position particularly generated a range of views.
- Whether the code should require declarations of interest to be made in writing, together with practical concerns about applying that to circumstances other than formal meetings eg telephone calls.
- Whether the threshold for registering gifts and hospitality should be set nationally or locally by standards committees. Also, whether the code should require the registration of gifts and hospitality offered to members but declined.

We have previously signalled our intention to work towards the revised code of conduct being in place from this autumn and coming into force probably at the beginning of April 2007 (to facilitate advance training of members). In part, this was to enable us to take account of revisions to the code of conduct in England.

This timetable is being reviewed in light of competing legislative priorities within the Assembly Government. While no decision has yet been taken, one option we are considering is to delay the code's introduction to coincide with the local elections in May 2008. This stems from a practical consideration that, if we are unable to introduce the revised code until the latter half of 2007, authorities might face added pressure on resources from having to provide two sets of training in relatively short succession ie prior to and following the elections. Any feedback from the conference on this, and indeed any other issues, would be most welcome.

Yours sincerely

**STEPHEN PHIPPS**

Head of Partnership and Ethics Team  
Local Government Policy Division