



30 October 2025

Simon Madden
Director of Propriety & Ethics

By email only

Dear Simon,

Thank you for your letter of 29 October 2025, notifying me that the new Governance Code on Public Appointments is to be published today, 30 October. I am delighted that the finalised Code takes on several of the recommendations I made in my 2023-24 Annual Report and during this consultation process.

In my 2023-24 Annual Report, I commented on how the lack of transparency of the Prime Minister's office's involvement in campaigns undermined the ability to hold the government to account for slow campaign speeds. I recommended that this process be made much more open. The publication of the Prime Minister's interest list and the confirmation that campaigns on this list will include a notice on the advertisement, is therefore a welcome change. This revision ensures much greater openness and should help improve candidate care.

I am pleased that my advice, to retain the category of significant appointments and the Senior Independent Panel Member (SIPMs), has been taken on board in the revised Code. Appointment processes should be proportionate. SIPMs facilitate that by bringing about a heightened degree of scrutiny for the most significant campaigns, where public and parliamentary attention is greatest. I will be progressing the recommendation, as set out in the letter from the Chancellor of the Duchy of Lancaster on 22 July 2025, that I consider ways to make the selection and distribution of SIPMs more efficient.

Improving campaign speeds is another important goal we share. As such, the introduction of an expectation that chair, chair-equivalent and office-holder campaigns complete within four months, and member campaigns in three months, is welcomed. Moving beyond a mere 'aim' that campaigns be completed within three months, and tracking campaign speeds across departments, will help hold departments accountable for slow campaigns. Alongside the reduction in compulsory ministerial involvement in campaigns, these changes should lead to faster, less bureaucratic campaigns.

The broader changes in the Code, to drive an increase in ethical standards, are positive. Especially important are the changes to Section 9. The new requirement for departments to consider the potential conflicts of interest of panel members and the additional nudge for candidates 'in doubt' to declare all potential conflicts, are useful additions. I hope these changes, alongside the revisions to



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the principles of Selflessness and Integrity, will have a real tangible impact in encouraging all involved in campaigns to uphold the highest ethical standards.

I look forward to working with your team, Departments and the Welsh Government on the operation of the new Code. My officials will be in touch to discuss the implementation of the new Code, particularly the new process for the selection and distribution of SIPMs.

Yours sincerely,

**William Shawcross CVO
Commissioner for Public Appointments**