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Llywodraeth Cymru
Welsh Government

The Rt Hon Vaughan Gething
Former First Minister of Wales

BY EMAIL

12 May 2026

Dear Rt Hon Vaughan Gething,

Thank you for seeking my advice under the Welsh Government's Business Appointment Rules for Former Ministers (the "Rules") in respect of undertaking three speaking engagements to a mix of students and staff at King's College London reflecting on life in ministerial office.

The Rules exist to protect the integrity of government and to safeguard public confidence in government by ensuring that former Ministers do not, and are not perceived to, derive improper advantage or profit from their time in office, or confer such advantage on others. In considering your application, my focus is therefore on whether any risks arise from your previous role and, if so, how these can be appropriately managed.

The material information and my consideration of your application are set out in the Annex. In accordance with the published guidance to the Rules, all three conditions below apply. However, I would draw your attention to the first condition, which is the most directly relevant to your application.

Standard Conditions:

- Privileged information condition** - You may draw on skills and experience gained from your time in office however you must not, at any time, draw on any privileged information gained in office. This is an ongoing duty irrespective of the time elapsed since you left office.
- Lobbying condition** - Any contact with the Welsh Government, directly or indirectly must only be where it could not reasonably be perceived as lobbying. This applies for two years after leaving office.
- Contracts and bids condition** - You must not work or advise on any bids to secure governmental funding or contracts. This applies for two years after leaving office.

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

I would also ask you to note the following points:

- This advice does not constitute an endorsement of your engagement in these guest lectures. It is limited to the application of the Rules and the management of any risks arising from your former ministerial role.
- This advice relates solely to your previous role in government as First Minister. It does not extend to, or replace, any rules administered by other bodies, including the Senedd Commission in respect of your previous role as a Member. It is your personal responsibility to ensure that you understand and comply with any other applicable rules and regulatory requirements alongside this advice.
- In this context, “privileged information” means information to which you had access by virtue of your various ministerial roles and which is not publicly available. You may also continue to be bound by other confidentiality obligations, including those under the Official Secrets Act, the Ministerial Code, or similar requirements.
- As set out in the Rules, the lobbying restriction prevents former Ministers from engaging in communication with government (including Ministers, civil servants, special advisers, and other public office holders), wherever that communication takes place, with a view to influencing a government decision, policy, or the award of a contract or grant in relation to their own interests or those of the organisation with which they are associated.
- While not a condition under the Business Appointment Rules, regard should be had to the principles set out in the Radcliffe Report of 1976 (Cmnd 6386) and although the series of guest lectures do not constitute a memoir, care should still be taken to refrain from sharing information that would be destructive of the confidential relationships between Ministers, or between Ministers and officials.

This advice relates specifically to the three guest lectures you are undertaking. As the Rules apply for two years following your departure from office, you are required to notify my secretariat of any further speaking engagements and of any change whereby the guest lecturer arrangement becomes more formalised or develops into an ongoing source of employment, including the payment of any retainer, at any point up to 6 August 2026, which marks the end of that period.

Yours sincerely,



Dr Melissa McCullough

Independent Adviser on Ministerial Standards / Cynhorydd Annibynnol ar Safonau Gweinidogol

Annex – Assessment of material information and consideration of risk

The Role

1. You submitted a Level 1 application in respect of undertaking three guest lectures to a mix of students and staff at King's College London reflecting on life in ministerial office. This is not an offer of employment, but it is remunerated.

Assessment

2. As recognised in the Business Appointment Rules, it is in the public interest that former Ministers are able to move into business or other areas of public life, including starting a new career or resuming a former one. It is equally important that, when a former Minister takes up any appointment or employment, there is no cause for concern as to its propriety.
3. In assessing the application, the key propriety tests were applied. It was concluded that the arrangement does not constitute an appointment or employment and could not reasonably be viewed as a reward for past favours, given that the institution operates within a non-devolved policy area. There is no risk of unfair advantage, as there is no ongoing employer relationship and the engagement is limited to sharing general reflections, with no exclusivity. While it is foreseeable that a former First Minister may be invited to speak about their time in office, any residual concerns regarding propriety are addressed through appropriate conditions outlined in my advice letter.

Consideration of the risks

4. No grounds for public concern have been identified in relation to the matters covered by this application. If the guest lecturer arrangement becomes more formalised or develops into an ongoing source of employment, including the payment of any retainer, a further application should be submitted. This requirement applies until the end of the two-year period on 6 August 2026.

Dr Melissa McCullough

12 May 2026