

Dr Melissa McCullough
Cynghorydd Annibynnol ar Safonau Gweinidogol
Independent Adviser on Ministerial Standards



Llywodraeth Cymru
Welsh Government

The Rt Hon Vaughan Gething
Former First Minister of Wales

BY EMAIL:

12 May 2026

Dear The 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 the independent consultancy you have established, CG Choma Ltd.

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. Notwithstanding the absence of client details at this stage, this formal advice is provided to establish the standard conditions that apply to all Level 2 applications, irrespective of their nature.

It further includes a limitation and engagement restriction condition applicable to your independent consultancy.

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.

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.



Parc Cathays • Cathays Park
Caerdydd • Cardiff
CF10 3NQ

Independentadviserwales@gov.wales
Gwefan • website: www.llyw.cymru
www.gov.wales

- **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.

Further Conditions

- **Limitation to the role** – For two years from your last day in office, you are prevented from advising clients on matters in which you were materially involved during your time in office.
- **Engagement restriction** – For two years from your last day in office, you should not initiate any engagement with the Welsh Government on behalf of those you advise under your consultancy (including related parties and clients).

I would also ask you to note the following points:

- This advice does not constitute an endorsement of the establishment of CG Choma Ltd. It is confined 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.

As the Business Appointment Rules apply for two years following your departure from office, you are required to notify my secretariat of each client engaged by your consultancy up to 6 August 2026, which marks the end of that period.

Yours sincerely,



Dr Melissa McCullough

Independent Adviser on Ministerial Standards / Cynghorydd Annibynnol ar Safonau Gweinidogol

Annex – Material information and consideration of the risks

The Role

1. You submitted a Level 2 application to establish an independent consultancy, CG Choma Ltd, using your skills and experience to offer advice on decision-making, stakeholder management and expectations, primarily in England and Wales. You have not secured any clients to date but the consultancy may cover policy areas which would have been within your previous ministerial portfolios. You do not have any desire to use the consultancy for the purposes of lobbying.

Assessment

2. You held a number of Ministerial roles between June 2013 and August 2024, including Deputy Minister for Tackling Poverty, Deputy Minister for Health, Cabinet Secretary for Health, Wellbeing and Sport / Cabinet Secretary for Health and Social Services, Minister for Health and Social Services, Economy Minister and First Minister. However, given the proposed nature of the work of the consultancy and the fact that no clients have been identified, it is only your last role as First Minister that has been considered at this stage.
3. 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.
4. The Guide to the Business Appointment Rules states that:

“Seeking advice on setting up an independent consultancy is the first step in the process. You will need to submit an application for advice for each client you intend to accept so that the nature of the work you will be undertaking for the client can be assessed in light of your previous ministerial role. All applications to set up an independent consultancy will therefore have a condition applied requiring an applicant to return for advice for each commission.”
5. You have put this application forward as a first step in the process, and my assessment has been made on a broad basis given the limited information available and that CG Choma Ltd has no current clients.
6. There is no indication that the proposed consultancy represents a reward for past favours, as an external appointment is not being offered.
7. Whilst you do not consider you hold commercially sensitive or privileged information, it is likely that you will have had access to sensitive information and unannounced government policy during your time as First Minister. The nature, relevance and potential

impact of this information can only be fully assessed with details of prospective clients as they arise.

Consideration of the risks

8. At this stage, no specific grounds for public concern have been identified based on the general outline of the consultancy, CG Choma Ltd. However, any future client engagements will require case-by-case consideration, and further advice must be sought in respect of each client up to the end of the two-year period on 6 August 2026.

Dr Melissa McCullough

12 May 2026