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

Llywodraeth Cymru
Welsh Government

Ms Rebecca Evans
BY EMAIL:

10 August 2026

Dear Ms Evans

Thank you for seeking my advice under the Welsh Government's Business Appointment Rules for Former Ministers (the "Rules") in respect of acting as Chair for three roundtable discussions for Business News Wales for which you will be remunerated.

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. This formal advice is provided to establish the standard conditions that apply to all Level 2 applications, irrespective of their nature.

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.

I would also ask you to note the following points:

- This advice does not constitute an endorsement of the facilitation role you are taking up. It is confined to the application of the Rules and the management of any risks arising from your former ministerial role.

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.

- This advice relates solely to your previous ministerial roles in government as Cabinet Secretary for Economy, Energy and Planning (September 2024 to May 2026) and Cabinet Secretary for Finance, Constitution & Cabinet Office (March 2024 to September 2024).

- 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.

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

You submitted a Level 2 application in relation to Business News Wales eight sector-based roundtable events focussed on looking beyond immediate pressures to consider what each sector needs to thrive over the next five to ten years. You have been invited to chair three of the events and facilitate discussions on the day. There is no ongoing commitment or offer of employment with Business News Wales.

Assessment

1. This is not an appointment to a role nor is it a contract of employment.
2. You were interviewed by Business News Wales on a number of occasions during your time as a minister and therefore would be known to the organisation. However, all such interviews formed part of a series of engagements, arranged and managed by the Welsh Government press team as part of normal government engagement.
3. The nature of the engagement is for you to facilitate three discussions rather than contribute to it. The standards conditions to be applied will sufficiently cover any remaining risk.

Consideration of the risks

Having considered the factors set out above, that the role is neither an appointment nor employment, together with the information you have provided, I have identified no reasonable basis for public concern in relation to you facilitating the three events with Business News Wales. I therefore see no grounds on which to advise against facilitating these events. Any risks that do arise can be appropriately managed through the standard conditions.

Dr Melissa McCullough
10 August 2026