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

Llywodraeth Cymru
Welsh Government

Mr Jack Sargeant
BY EMAIL:

21 October 2026

Dear Mr Sargeant

Thank you for seeking my advice under the Welsh Government's Business Appointment Rules for Former Ministers (the "Rules") in respect of undertaking consultancy work for the Advanced Manufacturing Research Centre (AMRC). The role is a short-term one-off engagement as a consultant following discussions with AMRC leadership. The piece of work would involve assessing AMRC's existing external positioning and mapping the political and policy environment over the next 12-24 months, with a particular focus on the Prime Minister's priorities for Government.

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.

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.

BUDDSODDWYR MEWN POBL | INVESTORS IN PEOPLE

Parc Cathays • Cathays Park
Caerdydd • Cardiff
CF10 3NQ

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

I would also ask you to note the following points:

- This advice does not constitute an endorsement of the work you are engaging in. 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 ministerial roles in government as the Minister for Social Partnership from 17 July 2024 until 11 September 2024, when you took up the position of Minister for Culture, Skills and Social Partnership until 12 May 2026.
- 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. Contact with former colleagues in government is permissible where it is clearly unrelated to lobbying, including in a social or party-political context. The rules also allow for communication with government as a routine part of a role where such activity would not be improper.
- For clarity, communication which is likely to be considered in keeping with the lobbying condition may include:
    - sharing factual information transparently (reporting via published research, opinion pieces, reports, annual reports, or through formal consultation), or
    - using existing and therefore implicitly agreed frameworks for contacts within government (but not making use of privileged networks) for routine communication. This includes asking for/providing factual information/updates and responding to requests from the government (e.g. an invitation to a meeting or to participate in a roundtable).
- Routine communication will be considered lobbying if it involves:
    - making contact with government on behalf of the organisation to make introductions or ask for meetings
    - asking the government to make a decision, or
    - proactively promoting the organisation's position on matters to the government - unless being done through a formal consultations process or another process initiated by the government.

In line with the Rules, I would ask that you notify my secretariat when this piece of work commences or is publicly announced, at which stage this advice will be published. I would also ask that you come back for further advice should the details of the work differ once they are confirmed. Likewise, a new application would be required if the role becomes one of employment.

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 possibly undertaking consultancy work for the Advanced Manufacturing Research Centre (AMRC). The role is a short-term one-off engagement as a consultant and would involve assessing AMRC's existing external positioning and mapping the political and policy environment over the next 12-24 months, with a particular focus on the Prime Minister's priorities for Government. As you do not have your own consultancy, you will be acting as a sole trader for the purpose of this contract only.

Assessment

1. This work has come about through discussions with the leadership team at AMRC and is not an offer of employment.
2. The Welsh Government has no financial records to indicate that you had been involved in any previous or current payments or decisions with the organisation or any contractual arrangements.
3. AMRC Cymru was opened with Welsh Government investment in 2019, which is before the period being considered in this application
4. You did not have any significant dealings with the organisation during your time as a minister and you have confirmed that you had no knowledge of trade information of competitors.
5. Whilst you would have had knowledge of the previous government's enacted and future proposals for the Welsh skills sector, those are mitigated by the fact that the role is a specific piece of work and is not employment. Any knowledge of unenacted proposals by the former government are no longer relevant given the recent election. In any event, the standard condition on use of privileged information will be applied.

Consideration of the risks

I have considered all of the points above and I see no grounds on which to advise against taking up this discrete piece of work. Any risks that do arise can be appropriately managed through the standard conditions.

Dr Melissa McCullough
21 October 2026