

Report on the Consultation of Part One of the Determination for the Seventh Senedd

28 March 2025

Background

- 1.** The Review of the Determination for the Seventh Senedd: Consultation Part One¹ was published on 25 October and closed on 6 December 2024. The consultation included policy proposals on Members' overnight accommodation, constituency office and engagement costs, and support for political groups.
- 2.** The Board is grateful to those groups and individuals who took the time to provide detailed and informed responses to the Part One consultation. A list of those who responded is at Annex 1.
- 3.** Following consideration of the consultation feedback, the Board is minded to proceed with the majority of its original proposals, subject to final decisions in the summer term following its Part Two consultation.
- 4.** A Part Two consultation on proposals for Members' pay and personal support, staffing support and some further matters relating to constituency office and engagement support for the Seventh Senedd will be published in early April.
- 5.** This report summarises the consultation feedback and the Board's considerations on each of the proposals.

¹ <https://business.senedd.wales/documents/s154677/ConsultationPartOne.pdf>

Overnight accommodation

Proposal One:

To replace the current three-area model with a two-area model for determining eligibility for overnight accommodation, featuring an Inner and Outer area only.

Background

6. Members are currently able to claim 'residential accommodation expenditure' (RAE) for the reimbursement of costs associated with overnight accommodation in the Cardiff area when Members stay away from home on parliamentary business. This entitlement is based on the distance of their main residence from Cardiff Bay. The distance from Cardiff Bay is split up into Inner, Intermediate and Outer Areas, as defined in the Determination on Members' Pay and Allowances.

7. The amount that Members can claim is calculated according to how far away they live from Cardiff, that is:

- Members living in constituencies furthest away from Cardiff Bay ('Outer Area Members) are entitled to be reimbursed for the costs of rented or hotel accommodation up to a maximum of £12,900 per annum in 2025-26, plus on-costs;
- Those living in the "Intermediate Area" (Intermediate Area Members) are entitled to a lower level of reimbursement of costs, equivalent to 72 nights in a hotel at a cost of £117 in 2025-26; and
- Those living in the "Inner Area" (Inner Area Members) may apply for a reimbursement of overnight accommodation in exceptional cases only.

8. However, in the Seventh Senedd Members will be representing new constituencies which do not share the same borders as those currently used to determine eligibility for overnight accommodation, meaning that the basis on which Members are reimbursed needs to be updated.

9. The consultation set out the eligibility for overnight accommodation, based on a map of new constituencies for the Seventh Senedd published by the Democracy and Boundary Commission for consultation.²

10. The Board suggested merging the current Intermediate Area with the Outer Area in order to ensure Members with long journey times would be able to claim for overnight accommodation. The Board also proposed a two-area model, based on Inner and an Outer Area, to further the Board's objective of simplification, arguing that it would be simpler to understand and administer.

Summary of responses

11. All political groups agreed that the current model, based on three areas – Inner, Outer and Intermediate - should be replaced with a two area model, of Inner and Outer areas only.

12. The Welsh Labour group commented that *'we feel that it is likely to lead to less anomalies and will be simpler for Members and those implementing the system'*.

13. The Plaid Cymru group agreed with the proposal but wrote that it had concerns that Members on the far edge of the Inner Area will still face long commuting times and there should be some provision for them to be able to stay in hotels during the week.

Consideration of responses

14. The Board noted the positive responses to the proposal to have two, rather than three, areas of eligibility for determining eligibility for overnight accommodation. The Board also noted the concern raised by the Plaid Cymru group about Members living on the outer edge of the Inner Area, and that the Determination states that *'In borderline cases, Members may apply to the Commission for their main homes to be deemed located in a different area where the Member believes this would be reasonable.'*

15. The Board's final proposal reflects the final Determinations published by the Democracy and Boundary Commission on 11 March 2025³.

² <https://www.dbcc.gov.wales/reviews/09-24/2026-review-initial-proposals>

³ <https://www.dbcc.gov.wales/reviews/03-25/2026-review-final-determinations>

Outcome

The Board is minded to implement the proposal for two areas of eligibility for overnight accommodation in the Seventh Senedd Determination: Inner and Outer areas only. These areas will be based on the constituency boundaries set in the final Determinations of y the Democracy and Boundary Commission for Wales.

Proposal Two:

Members' eligibility for overnight accommodation is based on either:

Option 1: Constituency boundary model - based on updating the current model to reflect the new constituency boundaries;

or Option 2: Travel-to-work time model - based on travel time, not distance of main residence from the Senedd building

Background

16. As set out above, the Democracy and Boundary Commission has consulted on and now published final the constituencies that will return Members for the Seventh Senedd. This change means that the current Inner, Outer and Intermediate Areas, used to determine eligibility for residential accommodation expenditure are no longer applicable, given the changes to constituency boundaries.

17. The Board had also received feedback that the constituency-based system is arbitrary, and the lack of flexibility can impact on Members' wellbeing.

18. The Board proposed two options for determining which Members will be entitled to claim the Inner and Outer Area costs in the Seventh Senedd. Respondents were asked to comment on a model based on constituency boundaries (based on the draft constituency boundaries published by the Democracy and Boundary Commission for Wales for consultation during the autumn of 2024) and an alternative travel-to-work time model, based on a travel time of 60 minutes by car.

Summary of responses

19. All respondents, apart from the Welsh Labour group, were in favour of having a model based on the constituency boundaries as proposed by the Democracy and Boundary Commission for Wales ⁴, for the Seventh Senedd. This model was generally viewed to be clearer and more straightforward to interpret and administer. For instance, the Senedd Commission commented that the travel time option:

'...seems likely to create onerous demands to ensure requirements for aspects such as audit can be adequately met. From some parts of Wales, travel by private/public transport may be used interchangeably, again leading to potentially complex calculations of eligibility for costs'.

20. Similarly, the Welsh Conservative group wrote that the travel to work option would be *'open to too much interpretation by Members and the electorate, which could lead to confusion and accusations of misuse of Senedd resources'.*

21. The Accounting Officer wrote that the constituency boundary model *'would be less administratively burdensome and would provide greater clarity for the public'*, and that the administrative demands created by the travel to work model outweighed the benefit gained. She also highlighted that the option for Inner area Members to stay occasional nights in the Cardiff area could mitigate adverse effects of the constituency boundary model.

22. The Senedd Commission argued that although both models will increase the budget requirements, the preference was for the constituency boundary model as it would be considerably easier to budget for.

23. The Welsh Labour group wrote in favour of the travel to work time model because it would be a:

'...sensible solution which offers clarity for Members and addresses the anomalies which arise under the current constituency boundary based approach, including the experience of some Members in the Intermediate Area of having to travel further and for longer from their main residence than some Members based in the Outer Area'.

⁴ 2023 Parliamentary Review - Final Recommendations | BComm Wales

24. The Welsh Liberal Democrat Member's view was that the distance from a Member's home address to the Senedd is the most appropriate for determining eligibility for overnight accommodation.

Consideration of responses

25. The Board considered the responses and that only one political group was in favour of the travel to work time option. There was overwhelming support for the option based on constituency boundaries.

26. All other respondents considered the option based on constituency boundaries to be a simpler, clearer model for the Seventh Senedd. The Board noted that this option would also be clearer for the public to understand and that for those implementing it, it would be would be less open to interpretation. The Board also noted the advantages of this model for budgeting and the fact that there is the potential for the administrative demands created by the travel to work model to outweigh the benefit gained.

27. Additionally, for those living in the most distant parts of the Inner Area, there is provision in the Determination for Members to apply to the Commission to have their main residence to be deemed to be in a different area where this is reasonable. The Board notes the difficulties experienced by Inner Area Members who face a difficult journey to Cardiff by car or public transport, however, the proposed changes to the Determination for the Seventh Senedd will enable them to claim from a budget for overnight accommodation without having to make a business case in advance.

28. The Democracy and Boundary Commission's final Determination has been published, and the Board intends that the following constituencies will be in the Inner and Outer areas:

	Members with a main residence in these constituencies:	Eligible costs and limits
Outer Area	Bangor Conwy Môn Clwyd Fflint Wrecsam Gwynedd Maldwyn Ceredigion Penfro Sir Gaerfyrddin Gŵyr Abertawe Brycheiniog Tawe Nedd	Accommodation (rental or other paid overnight accommodation), plus related costs, including council tax and utilities.
Inner Area	Afan Ogwr Rhondda Pontypridd Cynon Merthyr Blaenau Gwent Caerffili Rhymni Sir Fynwy Torfaen Casnewydd Islwyn Caerdydd Penarth Caerdydd Ffynon Taf Pen-y-bont Bro Morgannwg	Budget for overnight accommodation based on six nights at the hotel rate.

Outcome

The Board is minded to determine that Members' eligibility for overnight accommodation is based on the constituency in which they have registered a main residence.

Proposal Three:

All Members with a main residence in the Inner Area are provided with up to 6 nights per year in overnight accommodation in the Cardiff Area

Background

29. Members living in the Inner Area do not have a budget to allow them to claim the cost of overnight accommodation in Cardiff. However, they may claim the cost in exceptional circumstances, if they make a case to the Senedd Commission in advance.

30. This is because there are occasions when those Members need to stay overnight in Cardiff instead of travelling home between Senedd business days. For instance, if they have a late finish

following Senedd Plenary business, are attending a function, or have an early start the following day. There are also times when traffic disruption due to weather events, or other unexpected events mean a Member cannot travel home.

31. During the Sixth Senedd, the Board has received feedback during Annual Reviews of the Determination and drop-in sessions with Members that they often do not have advance notice of needing an overnight stay in Cardiff and that trying to arrange to stay overnight at short notice can be stressful and time consuming.

32. In order to give Members greater flexibility to make their own arrangements, within a set limit, the Board proposed to provide Inner area Members with an overnight accommodation budget equal to 6 nights' hotel accommodation per year in the Seventh Senedd. Members would also continue to be able to make a business case, in exceptional circumstances, to exceed this limit.

Summary of responses

33. All political groups agreed that Members in the Inner Area should be entitled to a budget to allow them to stay overnight in Cardiff for at least six nights. However, all political groups argued that the allocation should be increased. For instance, the Welsh Labour group urged the Board to:

'...either significantly increase the proposed limit or allow Members to book accommodation when required by late business, early business or travel disruption on the basis of their personal responsibility and accountability for all claims they submit'.

34. The Welsh Conservative group suggested the total allowance for the number of nights of hotel accommodation should be increased to 40 nights per year.

35. The Plaid Cymru group argued that it was not clear why the proposal was set at six nights per year. It called for a survey of Members' use of overnight accommodation to be carried out before decisions are taken on the limit. For instance, they said that many of their Members paid for at least one night a month in a hotel currently. It suggested additional Plenary days in future would require more overnight accommodation

36. The Accounting Officer responded:

'The proposal that all Members with a main residence in the Inner Area are provided with up to 6 nights per year in overnight accommodation in the

Cardiff Area, without need to pre-approval, would enable Members to be responsive to the balance of their needs.'

Consideration of responses

37. The Board noted the positive responses to this proposal and that respondents noted Member's ability to claim for overnight accommodation without the need to submit a prior business case will provide them with increased flexibility and decision making ability. The consultation document also referenced that Senedd business arrangements may be reviewed and therefore changed for the Seventh Senedd, with the possibility of more Plenary sessions and therefore this flexibility has been welcomed.

38. The Board however noted the differences in views about how many nights' accommodation should be provided. In order to gauge the demand for overnight accommodation by Inner area Members, the Board has consulted on a proposal for Inner area Members to claim up to 6 nights' overnight accommodation in Cardiff in the Annual Review of the Determination 2025-26. The Board will be monitoring the uptake of this provision from 1 April 2025, and the information gathered will inform decisions on provision for the Seventh Senedd.

39. This budget for Inner area Members' overnight accommodation will be a 'pilot' in order to gauge usage, the Board will keep the proposals for the Seventh Senedd under review.

40. The Board will monitor the uptake of this provision in advance of the Seventh Senedd and use the information inform the draft Determination for the Seventh Senedd.

Outcome

The Board will monitor the use of the overnight accommodation allowance following the new provision for overnight accommodation for Inner area Members introduced from 1 April 2025.

Constituency Office and Engagement

Proposal One:

Removal of the principles relating to office provision set out in Chapter 6 of the Determination

Background

41. Members are required to ensure value for money for the taxpayer under the overarching principles of financial support set out at the beginning of the Determination. Furthermore, Members must seek to ensure that any expenditure incurred provides value for money to the taxpayer, represents the most sustainable and reasonable option available and does not have a negative effect on the reputation of the Senedd or its Members.

42. The Determination states that to receive funding for their offices, Members should follow several principles:

- reputation of the Senedd: all offices should reflect the status and importance of the Senedd as a national institution and be mindful that the office is the local face of the Senedd;
- safe and secure: all offices should be safe, secure, visible and reachable by the public;
- accessible: offices should be accessible spaces for all those who need to use them;
- open and welcoming: all offices should be staffed by paid staff.

43. Members are separately subject to statutory equality duties and health and safety duties and must also ensure their offices provide for the security requirements of their staff and constituents

44. Following feedback and to reflect the changing ways of working of Members and the introduction of new, larger, multi-member constituencies, the Board proposed to remove the principles on office accommodation in order to provide Members with sufficient flexibility and choice as to how they organise their office in the Seventh Senedd.

45. The Board's view was that the principles relating to office accommodation are therefore already covered by the Determination's overarching principles and Members' wider statutory duties.

- 46.** Both the Labour and Plaid Cymru Groups disagreed with the proposal.
- 47.** The Plaid Cymru group noted the importance of constituency and regional offices for constituents as a place to engage with Members and felt that the removal of the principles could discourage Members from leasing offices. They also noted the importance of flexibility for Members in the new multi-Member constituencies of the Seventh Senedd to be able to lease more than one office or other spaces to meet with constituents.
- 48.** The Labour Group acknowledged that the principles on office accommodation are reflected separately, such as other parts of the Determination and the Accounting Officers' Rules and Guidance on the Use of Senedd Resources. It also noted that the resourcing available to Members has not always been sufficient to meet the aims of the principles, in particular leasing accessible offices in areas of high rent. Nevertheless the Group's view was that the principles will remain relevant in the Seventh Senedd and should be retained.
- 49.** The Welsh Conservative Group noted that the principles are useful in order to ensure Members' constituency and regional offices are of a suitable standard.

Consideration of responses

- 50.** The Board considered the views expressed. The Board recognised that there are different views about the need for and purpose of constituency offices; the Board's objective is to make resources available that are sufficiently flexible and responsive to Members' preferences and needs.
- 51.** The Determination already includes some general principles which are relevant to Members' choice and use of offices. It therefore concluded that some of the specific principles relating to offices are no longer reflective of the way in which Members use their offices. In particular some Members now choose to lease offices in less publicly 'accessible' locations. For example, industrial estates located outside of town centres. This reflects that offices are leased by some Members solely as a place of work for them and their staff rather than primarily as places to meet with or engage with the public.
- 52.** Additionally, the Board noted that the principle of 'open and welcoming' is not always relevant to the current working arrangements of Members as offices are not always kept open due to security concerns, and in some cases staff will be working from home; modern ways of working therefore meant that this principle was not achievable nor necessarily desirable. It was

also noted that it may not be clear to Members how to put into practice the principle of protecting the reputation of the Senedd.

53. As noted above some respondents to the consultation clearly felt that removing the principles on office accommodation could dissuade Members from leasing offices. This is not the intention, but rather to provide Members with greater flexibility and the constituency office and liaison budget for the Seventh Senedd will continue to allow all Members to lease an office if they so wish. The intention of the removal of the principles is simply to reflect current ways of working, to provide as much flexibility as possible for Members in terms of how offices leased are used and how they engage with constituents, as well as to simplify the Determination. Removal of the principles should not affect Members' decisions on whether to lease an office. However should they choose to do so their use of the office will no longer be subject to the principle of being 'open and welcoming' allowing for the use of an office solely as a place of work or any other purpose for which the office is leased.

54. The Board is committed to simplifying the Determination by removing redundant or unnecessary content. For these reasons the Board felt the principles should be removed as the principles which remain relevant, including the security of offices are already covered in law, the Determination's overarching principles or the Accounting Officer's Rules and Guidance on the Use of Senedd Resources.

Outcome

The Board is minded to remove the principles on office accommodation, noting that relevant principles and requirements will remain in the Determination including reasonableness, sustainability, reputation and value for money.

Proposal Two:

An office start-up budget to be available to all Members

Background

55. The office start-up allowance is available to 'Members who wish to establish a constituency or regional office for the first time'.

56. However, in the Seventh Senedd, there are likely to be returning Members who will be representing new constituencies due to constituency boundary changes. As such, those

returning Members could face additional costs to either re-locate their existing constituency office or to update signage and other communications materials to reflect the new constituency name.

57. For this reason, the Board propose that the office start-up budget be available to all Members at the start of the Seventh Senedd. The budget could be used by new Members setting up an office and by returning Members who are not relocating but may need to make reasonable changes to their offices.

Summary of responses

58. The Welsh Conservative and Welsh Labour groups agreed with the proposal.

59. The Plaid Cymru group noted that all Members of the Seventh Senedd should be provided with an office start-up budget for a specified period of time. They also noted that office equipment should be made available to another Member when a Member loses their seat or stands down.

60. The Senedd Commission and the Accounting Officer noted that re-elected Members who do not re-locate their constituency office would not face the same office start-up costs as other Members although some costs would be incurred due to Senedd reform e.g. changes to signage to reflect new constituency names.

Consideration of responses

61. The Board noted that following the election some Members may prefer to re-locate their offices and some, returning Members, may not. The Board considers that all Members should be able to set up their offices in the way they choose and therefore, all Members should have access to the office start-up funding. The Board noted that sufficient safeguards are in place to protect against unnecessary expenditure by Members meaning those Members who do not lease an office will not be able to spend unnecessarily, even if the full start-up budget is available to them.

Outcome

The Board is minded to provide all Members with an office start up budget in the Seventh Senedd.

The Board will also consult on further 'office start-up' matters in the Part Two consultation on the Determination for the Seventh Senedd.

Proposal Three:

All Members will receive the same Constituency Office and Engagement budget

Background

62. The Determination sets out a lower and a higher rate of amounts that Members may claim in order to run an office. From 1 April 2025, Members who work exclusively from the Senedd office in Cardiff Bay may claim up to £11,205 per annum for their business costs. Members who choose to lease an office in their constituency or region may claim up to £27,430 for their business costs.

63. However, the Board recognises that Members have different preferences in their approach to constituency working and engagement. The use of offices has changed in recent years and is likely to evolve further when all Members will serve multi-member constituencies in the Seventh Senedd. Since the Covid-19 pandemic, there has also been an increase in remote working, and ways of working have changed significantly.

64. For this reason, the Board proposed that all Members will be able to claim the same level of budget, irrespective of whether or not they have a constituency office. By removing the lower limit on expenditure for those who do not have a constituency office, Members will be able to determine how they meet the needs of their constituents and their preferred way of working.

Summary of responses

65. The Labour Group agreed with the proposal stating that equity in the resourcing of all Members is important.

66. The Plaid Cymru group disagreed on the basis that the proposed change could place Members who lease an office in a disadvantageous position compared to those who do not lease an office as they would have less of their constituency office and engagement budget available to spend on engagement with constituents.

67. The Senedd Commission noted that the proposal would lead to increased costs which cannot be estimated presently and that the greater cost impact would arise during an election year as the constituency office and engagement budget available to Members could no longer be pro-rated from the date on which an office lease is agreed, with all Members to receive the full budget from the time of their election.

68. The Accounting Officer agreed with the proposal but also noted that Members able to run their offices exclusively from Tŷ Hywel might be treated more advantageously in financial terms

than Members who need to lease an office. Members representing areas in and around Cardiff could run their offices entirely in Tŷ Hywel without cost whilst Members representing other areas of Wales and who need to lease a constituency office would have to pay office rent and associated costs.

Consideration of responses

69. The Board considered all views provided.

70. The Board noted that part of the need for a constituency office is to facilitate engagement with constituents. As such the cost of leasing an office should be considered an engagement cost alongside the costs of other types of engagement with constituents and Members can choose their preferred means of engagement.

71. The Board noted that analysis of expenditure shows that Members in the current Senedd spend different amounts on engagement costs, and on office costs and some do not have a constituency office at all. The Board's view is that providing all Members with the same constituency office and engagement budget provides maximum flexibility and simplicity and does not disadvantage some Members compared to others.

Outcome

The Board is minded to provide all Members with the same level of Constituency Office and Engagement budget in the Seventh Senedd.

Proposal Four:

Constituency Office and engagement budget to remain at current level (subject to annual indexation) in the Seventh Senedd. Virement between budgets will be retained

Background

72. The proposed new Senedd constituencies are larger, and more populous than the current constituencies. However, they are smaller than the current regions. In advance of the move from Members representing both constituencies and regions to representation by multi-Member constituencies, the Board reviewed the amount of funding available for constituency offices and engagement. Expenditure data analysis suggests that the current budget is sufficient for most Members.

73. Having reviewed the evidence, the Board did not propose to change this budget but to continue the practice of uprating the total amount available by the inflation rate.

74. Members are able to vire funds between budgets according to their priorities, which provides added flexibility for them to allocate funds according to their needs and priorities.

75. The Board consulted on whether the existing limits for virement between Members' budgets provide sufficient flexibility or whether these should be increased or reduced ahead of the Seventh Senedd, and if so for what reason.

Summary of responses

76. The Labour Group and Senedd Commission agreed with the proposal. The Labour Group suggested that the sufficiency of the budget should be reviewed during the Seventh Senedd.

77. The Plaid Cymru group disagreed with the proposal, noting that the budget should be increased to reflect the greater costs for Members of working in larger constituencies in the Seventh Senedd and inflationary pressures on Members' expenditure.

78. The Labour and Plaid Cymru groups agreed that virement between the constituency office and engagement budget and Members' staffing budget should be retained. Both groups made the case for an increased limit for viring to provide Members with greater flexibility to manage budgets according to their own needs and preferences.

79. The Welsh Conservative group was in favour of merging the staffing and constituency office and engagement funds.

Consideration of responses

80. The Board has previously considered Members' spending of the office and constituency liaison fund during the Sixth Senedd. In 2023/24 (the latest available data), 55% of Members spent under 75% of their office and constituency liaison budget and 13% of Members spent over 90% of their available budget. Total spend across the whole budget of all 60 Members was 72% in 2021/22, 80% in 2022/23 and 74% in 2023/24. The Board has therefore concluded that the budget level is currently sufficient.

81. In view of the comments in the consultation responses, the Board agreed that the sufficiency of the budget should be reviewed during the Seventh Senedd based on the experiences and needs of new and returning Members and their ways of working in new constituencies.

82. The Board considered the responses on the limit on the amount which Members are permitted to vire between their constituency office and engagement budget and their staffing budgets. Taking on board feedback, and in line with its strategic objective of providing flexibility for Members to determine their own priorities, the Board is minded to increase the maximum amount of permitted virement between the staffing and constituency and engagement budgets from 25% to 50% of the value of the constituency office and engagement fund.

83. The Board will consult on this specific proposal through its Part Two consultation on the Determination for the Seventh Senedd.

Outcome

The Board is minded to maintain the constituency and engagement fund at its current level (subject to annual indexation) in the Seventh Senedd.

The sufficiency of the budget will be reviewed during the Seventh Senedd based on the experiences and needs of new and returning Members and their ways of working in new constituencies

The Board will consult on increasing the maximum amount of permitted virement between the staffing and constituency office and engagement budgets from 25% to 50% of the value of the constituency office and engagement fund.

Proposal 5:

Remove the requirement for the Senedd Commission to pre-approve Members' office leasing decisions

Background

84. Currently, the Determination sets out that the Senedd Commission has to approve certain decisions by Members relating to the leasing, sub-letting and sharing of offices. For instance, the Senedd Commission has to approve an office sharing arrangement where a Member rents part of an office from or to a party political organisation or trade union and must be satisfied that any proposed rental variation has been assessed by a qualified valuer. Likewise, any proposed increase to that rent of will not be reimbursed unless the Commission is satisfied that it is reasonable.

85. The consultation set out that Board intends to ensure clarity on the Commission's role in supporting Members' decisions on leasing offices. Also, the Board reiterated that the principles of value for money and reasonableness apply to all claims made. The Board's view is that Members should be fully accountable for all aspects of their expenditure and therefore proposed removing the requirement in the Determination for the Senedd Commission to provide prior approval of Members' leasing decisions.

Summary of responses

86. The Plaid Cymru and Welsh Conservative groups did not express a view on this proposal.

87. The Welsh Labour group disagreed with the proposal on the basis that such pre-approval of Members' office leasing decisions is important for the purposes of transparency and accountability. The Group noted that consideration should be given to avoiding the need for more than one valuation of an office rent for example following a change in ownership of leased accommodation.

88. The Accounting Officer agreed with the proposal. The Senedd Commission noted that it is right that responsibility for ensuring the suitability of office leases should sit with Members rather than the Commission.

Consideration of responses

89. The Board noted the view that the pre-approval of leases by the Senedd Commission is important for transparency and accountability.

90. The Board also noted that, should the requirement for pre-approval of office leases be removed, there will still be a requirement for Members to deposit a copy of lease agreements with the Commission, meaning lease agreements would be available for audit purposes and transparency and accountability would be maintained.

91. The Board concluded that responsibility for the suitability of office lease agreements should sit with Members and that the requirement for pre-approval of lease agreements by the Commission blurs lines of accountability; the Board is therefore minded to remove the requirement on the Senedd Commission to approve lease agreements.

Outcome

The Board is minded to remove the requirement for the Senedd Commission to pre-approve Members' office leasing decisions in the Seventh Senedd Determination.

Senedd Group Support

Proposal One:

Support for Political Parties to be renamed Senedd Group Support

Senedd Group Support is provided to Groups, as defined in Standing Orders, for the purpose of assisting those Members who belong to the Group in the performance of their functions as Members of the Senedd.

Additional support for individual Members (as is provided now) or groups of Members that do not meet the definition of a political Group set out in Standing Orders will no longer be eligible.

Background

92. The Board consulted on the change of name for this fund, from 'Support for Political Parties' to 'Senedd Group Support'. This proposal sought to clarify the purpose of the support for groups of Members and avoid any misunderstanding around the use of the support for party political activity, despite the Determination being clear that this is not permitted.

93. Section 24 of the Government of Wales Act 2006 provides that the Board may make provision for assistance to "political groups". Section 24 also provides that it is for the Senedd to define a "political group" for this purpose through Standing Orders. The Board's view is therefore that Senedd Group Support should be provided only to "political groups" within scope of the Standing Order definition (currently Standing Order 1.3). The Board's view is that this would more closely align the group support with the Board's powers in the Government of Wales Act 2006 and the Board's stated purpose for group support.

Summary of responses

94. There was broad support for the proposed name change to 'Senedd Group Support', however, the Plaid Cymru group and an individual respondent disagreed. The Plaid Cymru group view was that:

'It is important to demonstrate the central role of political parties in our parliamentary democracy...the name also needs to reflect the purpose of the provision'.

95. The Plaid Cymru group provided some further views on the nature of policy development and political party funding and:

'...regret that funding arrangements in Wales continue to differ from those in the House of Commons, the Scottish Parliament and Northern Irish Assembly. These structural issues would appear to be a hangover from the early days of devolution and the constitution of the then Assembly established in 1999 as a corporate body.'

96. Similar concerns were echoed by an individual response and the National Union of Journalists noted the importance of policy development as a core function.

97. There was support for the proposal for Senedd Group Support to be provided only to Groups as defined in Standing Orders. All groups agreed with this proposal, however, the Plaid Cymru group noted that further research should be taken to consider the impact on individual Members and that there is *'an argument that they should be afforded with additional support required to carry out their scrutiny work'*.

98. The Senedd Commission noted that *'all backbench Members have a crucial role to play...'* and where Members were not part of a group *'...those Members feel that they need additional support to enable their participation in Senedd business to be coordinated, as their members will likely wish to work together. They may look to the Commission or the Board to meet that need.'*

Consideration of the proposals

99. There was broad support for the change of name from 'Support for Political Parties' to 'Senedd Group Support'. The Board noted those views that disagreed with the proposal, however, it remains of the view that renaming the group support is important to provide clarity of purpose and is consistent with the statutory powers of the Board.

100. The functions and powers of the Board relate only to providing support for "political groups" as set out in the National Assembly for Wales (Remuneration) Measure 2010 and the Government of Wales Act 2006. The Board has no power to amend this legislation – that would be a matter for the Senedd and/or the UK Parliament. The Senedd has legislated, through the Measure and section 24 'Assistance to Groups of Members of the Senedd', that the Board's functions relate only to Senedd 'groups' as set out in Standing orders, rather than political parties.

101. In addition, the Board will include a broader summary of the purpose and usage of group support than is currently included in the Determination. This should provide groups and Members with greater clarity on the scope of the support, within the context of the principles in the Determination.

102. The Board noted the comments made relating to the need for support to be provided to all 'backbench' or individual Members and to support their ability to participate in Senedd Business. However, the majority of respondents supported the move to provide group support funding only to Groups as defined in Standing Orders in the Seventh Senedd. It is important to note that individual Members will continue to be provided with resources and support, via the Determination, through their constituency office and engagement and staffing budgets and they will also be able to pool their resources..

103. The Board has noted that the Future Senedd Committee's review of Standing Orders⁵ has concluded that an increase in group size from 3 to between 5 to 10 Members is appropriate for a larger Senedd and that the Business Committee 'is better placed' to determine Standing Order thresholds. Until the Business Committee has made a decision, the Board's assumption for the purposes of modelling has been that the threshold for a Group under Standing Orders remains at three Members. The Board will await any recommendations for changes to Standing Orders made by the Business Committee in this regard.

Outcome

The Board is minded to change the name of Support for Political Parties funding to 'Senedd Group Support'.

In the Seventh Senedd, the Board is minded to provide this support only to Groups, as defined in Standing Orders, for the purpose of assisting those Members who belong to the Group in the performance of their functions as Members of the Senedd.

The Board is minded to remove the current additional support for individual Members, or groups of Members that do not meet the definition of a political Group set out in Standing Orders in the Seventh Senedd.

The Board will review the Senedd Group Support following any decision of the Business Committee on changes to Standing Orders.

⁵ <https://senedd.wales/media/fmtat4pn/cr-ld17024-e.pdf>

Proposal Two:

Senedd Group Support provides Groups with resources to provide central administration and coordination, research and policy formulation related to Members' duties, communications support, pastoral and wellbeing support, equipment and services. This includes costs related to staffing as well as operating a group office.

Background

104. The Board undertook research and engaged with Members and groups on the purpose of Senedd group support.

105. The Board's aim was to maintain flexibility for the group budget to be responsive to the needs, priorities and ways of working of Members in each group, but to include a broader summary of the purpose and usage of group support than is currently included in the Determination. This should provide groups and Members with greater clarity on the scope of the support and it would continue to be set in the wider context of the core principle set out in Chapter 1 of the Determination that 'claims must not be made for expenditure relating to party political expenditure'.

Summary of responses

106. The proposed new purpose was supported or welcomed by most respondents, including all of the political groups and the Accounting Officer; it was generally regarded as a 'better' reflection of the wider remit of groups.

107. The Welsh Conservative group made the case that it should explicitly recognise the additional demands of an 'official opposition' and the Plaid Cymru group stated that it should include the '*...work of forming and supporting a shadow cabinet to scrutinise the government, and reflect the important work of developing an alternative programme for government.*'

108. The Plaid Cymru Group response and an individual response highlighted policy development as a core role and pointed to the approach of Short Money; the individual response also argued that the proposed purpose was too narrow and that the Board should provide party political funding.

109. The Plaid Cymru Group and an individual noted the administrative burden and inflexibility of having to seek pre-authorisation of group expenditure from the Senedd Commission, and

suggested that this could put the Accounting Officer in a challenging position on occasions. The Plaid Cymru group noted:

'The current system places significant personal responsibility on the Chief Executive and Clerk of the Senedd, acting as the Principal Accounting Officer of the Senedd Commission, for all political group expenses. This structure does not fully acknowledge the inherently political nature of Senedd Groups and Members' work in the Senedd.'

110. An individual response echoed those views suggesting that the standards regime or the courts are the vehicle for any alleged breaches in expenditure and it would be more appropriate to place the responsibility for expenditure on Members, supplemented by a system of external audit.

111. The Welsh Conservative group welcomed the revised purpose and greater flexibility but asked that:

'...support allowed to be spent on Group promotional items. For example, producing policy booklets or leaflets informing constituents on issues that relate to the work of the Group in the Senedd have to come from an individual MS or MS' budget despite relating to the work of the Group.'

112. The Accounting Officer was supportive of the proposed definition but sought clarification, for future administrative purposes, with regards the *'...expectation for use of the funds predominantly on employing staff'* and whether *'...the list of categories provided in the purpose is exclusive or indicative, as well as whether the Board intend to capture a broad range of expenditure beyond the core purposes identified in its consultation'*.

Consideration of responses

113. Responses often compared the current and proposed support for political groups with the House of Commons' Short Money and the UK Policy Development Grant and highlighted frustrations with the constraints on political party and policy development support in the Senedd context.

114. The Board's statutory functions relating to support for "political groups" in the Senedd is set out in paragraph 94 and 101 above. Short Money and the UK Policy Development Fund are distinct sources of funding and are provided or distributed by the UK Parliament and the Electoral Commission.

115. The Board notes that the Senedd Standing Orders do not currently reference nor recognise an 'Official Opposition' or 'opposition' in the Senedd. The Board's proposed purpose is broader than the current definition and clarifies that the formulation of policy is a core purpose of the political group support, however, the line between developing alternative policy proposals to inform the effective scrutiny of Government and party political activity can be a grey area. For example, developing a manifesto as part of an election campaign would clearly be excluded from the scope of the support for political groups.

116. 'Policy development' was a term frequently referenced in consultation responses; the Board therefore intends to include the term 'policy development' in place of 'policy formulation' which was originally referenced in the proposed purpose, in order to provide greater clarity and consistency of terminology.

117. A number of responses pointed to the importance of legislative scrutiny as a function of the group support which, although included in the consultation document as a core function of all groups, was not explicitly referenced in the proposed new purpose of Senedd Group Support. The Board therefore intends adding this to the purpose for clarity and as a key role fulfilled by groups, in particular non-government groups.

118. The Determination currently sets out that group support funding can be used for staffing costs and office equipment and hire of facilities and any 'remaining balance' can be used for external expertise for research into policy development, exploration of issues of significance to constituents and scrutiny of policy, legislation or advice. The Board notes that the Accounting Officer sought clarity whether the funding is provided '*predominantly on employing staff*' and whether '*...the list of categories provided in the purpose is exclusive or indicative*'. In order to give Members flexibility in their decision-making, and to provide clarity of interpretation, the Board is minded to confirm that the list is indicative and also to include reference to 'externally commissioned services' in this list of purposes for the fund.

119. The Board noted the views from some about streamlining the process of pre-approval of expenditure, the Accounting Officer's remit and potential for external audit.

120. The Board's statutory role and functions and the Accounting Officer's statutory role and functions are however distinct and separate; the Board's functions are limited to determining salaries and allowances for Members and pensions and gratuities for former Members, while any administrative and audit provisions are for the Accounting Officer to determine. It is therefore not appropriate for the Board to provide direction as to how the Accounting Officer should discharge her functions or vice versa.

Outcome

The Board is minded to revise the original proposed purpose for including in the Determination for the Seventh Senedd (post-consultation additions/revisions are underlined or struck-through):

Senedd Group Support provides Groups as defined in Standing Orders with resources to provide central administration and coordination, support for scrutiny, research and policy development ~~formulation~~ related to Members' duties, communications support, pastoral and wellbeing support, equipment and services. This includes costs related to staffing, externally commissioned services, as well as operating a group office.

Proposal Three:

There will be no set quantum for the total Senedd Group Support.

Background

121. Currently there is a fixed budget for political group support. This is to ensure value for money for the tax payer and it aids financial planning for the Senedd Commission by reducing the potential for volatility in the budget.

122. However, the Board proposed to remove the limit on this fund in response to the feedback gathered during the review of this funding. The Board heard that sharing a fixed budget between groups means that groups can receive lower funding during a term due to changes in another group.

Summary of responses

123. There was broad support for this proposal, for example, the Welsh Labour group noted that it would be *'a fairer, more consistent and transparent way of determining group funding than the current quantum-based model.'*

124. The Commission however noted that it would be difficult for it to budget without a set quantum and requested that the modelling and assumptions be shared to aid budget planning.

125. The Plaid Cymru group was supportive, but made the case that groups should be protected to ensure that '*...are not financially impacted should there be a reduction in the number of Members of their Group in the middle of a Senedd term.*'

Consideration of responses

126. The proposals were broadly supported by respondents.

127. The Board's proposed approach has been developed to provide clarity of allocation for groups and to better protect groups from the potential impact of changes to other groups.

128. The issue raised by the Commission about the challenges of making budget assumptions for the group support ahead of the Seventh Senedd term has subsequently been discussed by the Chair, Llywydd and the Commissioner responsible for budget and governance at the Board/Commission meeting on 20 January; the Chair and Accounting Officer provided reassurance that budget-setting can be managed through modelling of various scenarios, and the Board will share its scenario planning assumptions with the Commission.

Outcome

The Board is minded to not set a quantum for the total amount of Senedd Group Support funding.

Proposal Four:

Support will continue to be provided to all groups, with a higher proportion of support provided to non-government Groups.

Background

129. The current approach provides support to all groups, including those represented in Government, which receives a reduced and capped allocation to ensure a higher proportion of support is provided to non-Government groups.

130. The Board noted that the Government group is able to call on the considerable resources of the civil service and special advisors for policy development. It was also noted that 'Short Money' in the Scottish and UK Parliaments is not provided to groups represented in

government. It is not uncommon in other countries, however, for groups represented in government to receive funding albeit at a lower level than non-government groups.

131. The Board also heard views that the Government group includes a sizeable number of 'backbench' members who participate in scrutiny and require collective support provided by this funding, such as central administration, communications and pastoral support.

132. The Board therefore proposed to continue a model of support provided to all groups, with a higher proportion of support provided to non-Government Groups.

Summary of responses

133. This proposal was broadly supported by all group responses.

134. The Welsh Conservative group however expressed concern that '*...under the proposed arrangements, the current government group would receive a higher proportion of the overall funding available than is currently the case*', noting a 2.24% increase for the current government group and a 0.19% reduction for the current largest non-government group.

Outcome

The Board is minded to continue to provide support to all groups in the Seventh Senedd, with a higher proportion of support provided to non-government groups.

Proposal Five:

Group Support in the Seventh Senedd will be distributed via a Tiered Per Member rate, reduced with Group size. Government groups will receive a reduced Per Member rate.

Background

135. The Board intends that the model for funding Senedd groups in the Seventh Senedd will deliver the Board's core principles on Senedd group support, as set out in the consultation document⁶.

136. The Board has explored several models for group support, which were tested against a number of scenarios to consider the proportion of funding that would be provided to the government Group or Groups, non-government Groups and the level of support that the smallest Groups would receive, as well as the impact of coalition governments. The testing also factored in how mid-term volatility in Group membership would impact on Groups and the overall Determination budget.

137. The Board proposed to introduce a model of funding based on per Member rates, with the 'core' Non-Government Group per Member rate being £55,000 per Member (with reductions as set out below applied per tier or for Government Groups):

Number of Members	Non-Government Group Per Member Rate	Government Group Per Member Rate (75% reduction compared to non-Government Groups)
Up to 5	100%	25%
6 to 39	50%	12.5%
40+	25%	6.25%

138. This model was the most clear, simple and transparent considered by the Board and provides the greatest clarity about the level of funding that would be provided to each Group following an election or following any mid-term changes. This model would allow parties to model potential budgetary allocation based on their own electoral performance or group

⁶ Paragraph 108, business.senedd.wales/documents/s154677/ConsultationPartOne.pdf

organisation, and would not be affected by the performance or discipline of other political groups.

Summary of responses

139. This proposal was broadly supported by the majority of political groups.

140. The Welsh Labour group noted however:

'...we would not support any further reductions to the proposed rates outlined in ... any decrease in funding levels below the proposed 75% reduction for government groups would unfairly discriminate against these groups and make it impossible to recruit enough group staff to support their Members with all of the collective functions identified by the board.'

141. The Plaid Cymru group reiterated its previous point about group funding not being impacted if there is a reduction in group Members during a term, noting:

'It is important that the Determination allows for Groups to be able to, for example, protect staff roles which have previously been at risk of redundancy following disciplinary action by the Group to remove Members, or decisions made by Members to leave the Group and form a new political Grouping.'

142. Furthermore, the National Union of Journalists (whose membership includes some support staff) commented:

'As much as possible if there is a change in a Senedd groups due to a death, defection, resignation, suspension or expulsion there has to be relevant support for those that work for that particular member, including emotional support.'

143. The Commission noted that *'The enhanced stability of the proposed model would offer more stability for budgeting purposes.'*

144. The Welsh Labour and Plaid Cymru Groups were the only respondents to comment in response to the question relating to the impact on coalition partners. The Welsh Labour group stated that

'We believe that the overall approach proposed by the Board addresses the needs of all groups, with the proviso that government groups are likely to

face increased workload pressures within small teams and the arrangements should therefore be reviewed early in the Seventh Senedd.'

145. The Plaid Cymru Group commented

'We believe a general policy should be avoided as it would not be fair or proportionate on a/the junior party's political group. Rather, the support made available for political groups should be determined by the relative size of parties that form a coalition arrangement in government – because that number will impact the amount of Government support and resource made available to them.'

Consideration of responses

146. The Board noted the support for this funding model from the majority of political groups and the Senedd Commission.

147. In light of the support, the Board intends to proceed with the proposal as the basis of the distribution formula for group support in the Seventh Senedd.

148. The consultation paper included illustrative sums of funding per Member per group, noting that the Board was undertaking a review of the pay and grading framework for group and support staff. The Board will therefore consider and finalise the proposed sums of funding per Member per group following the Part Two consultation and its final decisions in the summer on the staff pay and grading framework.

149. The Board noted the feedback on the implications for potential coalition partners in the Seventh Senedd. The Board will further consider the implications of the proposed distribution following above staff pay and grading review and the conclusion of the Business Committee's review of Standing Orders on group sizes.

Outcome

The Board is minded to introduce a Tiered Per Member rate distribution formula as set out in the consultation document (and as per paragraph 138 above), reduced with Group size. Government groups will receive a reduced Per Member rate.

The Board will finalise the proposed sums of funding per Member per group and implications for groups in a coalition government following the Part Two consultation and its final decisions in the summer on the staff pay and grading framework.

The Board will further consider the implications of the proposed distribution following the staff pay and grading review and the conclusion of the Business Committee's review of Standing Orders on group sizes.

Annex 1: Respondents to the consultation

Douglas Bain, Senedd Commissioner for Standards

Professor Laura McAllister

Welsh Conservative Group

Welsh Labour Group

Plaid Cymru Group

Jane Dodds MS, Welsh Liberal Democrat Member

Accounting Officer, Senedd Commission

Hefin David MS, Senedd Commissioner

National Union of Journalists (representing some Member support staff)

Individual (support staff)

Annex 2: Final constituency boundaries for the Seventh Senedd

Published by the Democracy and Boundary Commission for Wales on 11 March 2025.

