

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Baroness Evans of Bowes Park, former Leader of the House of Lords. Paid appointment to join Rud Pederson UK.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former ministers (the Rules) on an appointment you wish to take up with Rud Pederson UK as a Senior Adviser.
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during your time in office, alongside the information and influence you may offer Rud Pederson UK (Rud Pederson). The material information taken into consideration by the Committee is set out in the annex below.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. The Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

The Committee's consideration of the risks present

5. The Committee¹ noted you did not meet with Rud Pederson during your time

¹ This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Isabel Doverty; Sarah de Gay; The Rt Hon Lord Pickles; Mike Weir; Richard Thomas and Lord Larry Whitty.

as a minister. The Cabinet Office also confirmed you made no decisions specific to Rud Pederson whilst in office. Therefore, the Committee considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.

6. As a former minister, there are inherent risks associated with your access to privileged information from your time in government. However, the Cabinet Office confirmed there is no direct overlap with your time in office and it did not have any concerns regarding your access to information.
7. There is a risk associated with any former minister joining an organisation that may lobby the government on behalf of its clients - in light of the lobbying ban that applies to all former ministers. The Committee considered it was significant that Rud Pederson confirmed your duties will '*...will have no role in lobbying for, or on behalf of, either Rud Pedersen or any of its clients*' & '*...It is fully understood, and has been expressly agreed between Baroness Evans and Rud Pedersen UK Ltd, that she will not be required to undertake direct or indirect advocacy on behalf of clients towards UK Government Ministers, Departmental officials or Members of Parliament*'.
8. There are risks related to Rud Pederson's unknown clients - should you advise clients you had contact with during government, or if you were to advise on matters you had involvement in whilst in government would raise risks under the Rules. The Committee considered this risk was limited, given your responsibility in government was surrounding business in the House of Lords - not policy development specifically.

The Committee's advice

9. You confirmed there will be no lobbying of the government in this role, in line with the expectations set out in the Rules. However, there is a risk you could be seen to be offering Rud Pederson unfair access and influence in this role. The Committee's advice is therefore that you should have no direct engagement with the government on behalf of Rud Pederson. The Committee also advises that you must not be involved in any work Rud Pederson may seek to take up with the government, whether commercial bids for work, or for funding.
10. To address the risk associated with Rud Pederson unknown clients, the Committee considered it necessary to impose a further condition. This makes it clear that in working with the company, you should not advise on work with regard to any policy you had specific material involvement in or responsibility for in your recent time as Lord Privy Seal and Leader of the House of Lords.
11. The Committee considered the conditions below will sufficiently mitigate the risks in this case. These seek to prevent you from drawing on your privileged information, contacts and influence gained in ministerial office to the unfair advantage of Rud Pederson.
12. Taking these factors into account, in accordance with the government's

Business Appointment Rules, the Committee's advice is this appointment with **Rud Pederson UK** be subject to the following conditions:

- you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in ministerial office;
 - for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of Rud Pederson UK (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Rud Pederson UK (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office you should not undertake any work with Rud Pederson UK (including parent companies, subsidiaries, partners and clients) that involves providing advice on the terms of, or with regard to the subject matter of a bid with, or contract relating directly to the work of, the UK government or its arm's length bodies;
 - for two years from your last day in ministerial office you should not have any engagement on behalf of Rud Pederson UK (including parent companies, subsidiaries, partners and clients) with the UK government; and
 - for two years since your last day in office, you should not advise Rud Pederson UK or its subsidiaries on any work with regard to any policy you had specific involvement in or responsibility for as Lord Privy Seal and Leader of the House of Lords nor where you had a relationship with the relevant business during your time as Lord Privy Seal and Leader of the House of Lords.
13. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. It is your personal responsibility to understand any other rules and regulations you may be subject to in parallel with this Committee's advice.
14. By '*privileged information*' we mean official information to which a Minister or Crown servant has had access as a consequence of his or her office or employment and which has not been made publicly available. Applicants are also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Civil Service Code or otherwise.
15. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/minister "*should not engage in communication with government (ministers, civil servants, including special advisers, and other relevant officials/public office holders) – wherever it takes place - with a view to influencing a government decision, policy or contract award/grant in relation to their own interests or the interests of the organisation by which they are*

employed, or to whom they are contracted or with which they hold office." This Rule is separate and not a replacement for the Rules in the House.

16. You must inform us as soon as you take up this role, or if it is announced that you will do so. You must also inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.
17. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

The Rt Hon Lord Eric Pickles

Annex - Material Information

The role

1. You said Rud Pederson UK is a public relations and communications firm. Its website says Rud Pederson UK is the UK-based subsidiary of the Rud Peterson Group (The Rud Pedersen Group consists of 8 brands specialising in public affairs, public relations, strategic communication, marketing and headhunting) The company offers the following services:
 - Advocacy
 - Crisis Management
 - Issue Management
 - Market Access
 - Political Festival Engagement
 - Political Risk Assessment
 - Public Affairs Training
 - Stakeholder Engagement
 - Strategic Communication
 - Tender Management
2. You said in your paid, part-time capacity as Senior Adviser you will would provide strategic analysis, support and advice to Rud Pedersen's consultants and clients on UK public policy and regulatory developments and the broader political landscape which may affect their wider interests and where relevant, and you might also participate – either as a contributor or Chair – in Rud Pedersen hosted events. You said you would not undertake any lobbying on behalf of Rud Pedersen or their clients towards UK Government Ministers or Departmental Officials. You also said she will maintain full compliance with the House of Lords Code of Conduct.
3. Rud Pederson UK provided confirmation that you '*...will have no role in lobbying for, or on behalf of, either Rud Pedersen or any of its clients*' & '*...It is fully understood, and has been expressly agreed between Baroness Evans and Rud Pedersen UK Ltd, that she will not be required to undertake direct or indirect advocacy on behalf of clients towards UK Government Ministers, Departmental officials or Members of Parliament, nor participate in*

any activity meeting the threshold for disclosure in the Register of Lords' Interests'.

Dealings in office

4. You advised the Committee that you did not meet with Rud Pederson UK whilst in office. You said you did not have any involvement in policy, regulatory or commercial decisions that would have been specific to the company.

Departmental Assessment

5. The Cabinet Office confirmed the details you provided, confirming there is no departmental relationship with Rud Pederson UK or the Rud Pederson Group and confirmed that you made no policy decisions relating to Rud Pederson UK or the Rud Pederson Group.
6. The Cabinet Office confirmed you did not have access to sensitive information and had no concerns with the appointment.