

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

March 2017

You asked for the Committee's advice about taking up appointments with IFM Investors and Brighton College International Schools.

The Committee noted that you propose to become an Advisory Board member at IFM Investors, a global provider of investment services across infrastructure, debt investments, listed equities and private equity. This is a paid role, which will involve 18 days' work a year. You will provide advice to the executives on strategy, investors and investments.

You also intend to take up the position of Chair of the Board of Brighton College International Schools (BCIS). This role will be unremunerated. BCIS was established in 2009 as a subsidiary of Brighton College to plan and set up British-curriculum schools around the world under licence to Brighton College. Each overseas school is privately and independently owned, and is operated by investment partners. The schools are managed by boards of governors, which include representatives of Brighton College in the UK.

When considering these applications the Committee took into account the following:

- You confirmed that neither role would involve contact with Government.
- You advised the Committee that you had no contact with IFM Investors during your last two years in Ministerial office and the Department for International Trade (DIT) has no relationship with the company.
- DIT advised that you had some contact with Brighton College of a personal nature connected with your longstanding role as a governor.
- You confirmed that you were not involved in any policy decisions, awards of grants or contracts or regulatory work relevant to either of these appointments.
- The Permanent Secretary at DIT has no reservations about these appointments.
- Twelve months have now passed since your last day in Ministerial office.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises the appointment 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 as a Minister; and
- for two years from your last day in ministerial office you should not become personally involved in lobbying the UK Government on behalf of IFM Investors or Brighton College International Schools or make use, directly or indirectly, of your contacts in Government to influence policy or secure business or funding on their behalf.

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.

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.*"

I should be grateful if you would inform us as soon as you take up these appointments, or if it is announced that you will do so, either by returning the enclosed form or by emailing the office at the above address. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments that have not been taken up or announced. This could lead to a false assumption being made about whether you had complied with the Ministerial Code.

Please also inform us if you propose to extend or otherwise change the nature of your roles as, depending on the circumstances, it may be necessary for you to make a fresh application.

Once these appointments have been publicly announced or taken up, we will publish this letter on the Committee's website and include the main details of the application, together with the Advisory Committee's advice, in the regularly updated consolidated list on our website and in the next annual report.

The Baroness Browning

The Rt Hon Lord Maude of Horsham