



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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You asked for the Committee's advice about accepting two new roles: Deputy Chairman of the Commonwealth Enterprise and Investment Council (CWEIC); and Senior Advisor at Apiro Capital (Apiro).

CWEIC

CWEIC is an international organisation representing governments and business from across the Commonwealth. It promotes trade between Commonwealth countries and their work includes bringing together Commonwealth Trade Ministers and leaders to discuss trade and investment cooperation.

The Committee noted that as Deputy Chairman, the role would be part-time, paid, and involve around two days' work per month. This would include attending four Board meetings a year, conferences and other meetings related to CWEIC in order to promote their activities.

In considering the application the Committee noted that the role would not involve lobbying the UK Government and that your former department, the FCO, has no objections to the application.

Apiro

As Senior Adviser at Apiro you would be a part-time, paid, member of the advisory board working for around two days a month. Apiro is an investment company and in the role, you would assist and advise on strategic business development.

In considering your application the Committee noted that you had no official dealings with Apiro or their competitors whilst in office; had no access to any commercially sensitive information about their competitors; and that this role would not include any contact with Government. They also took into account that your former department had no concerns about the appointment.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advises the appointments each be subject to the following conditions:

- that you should not draw on (disclose or use for the benefit of yourself or the organisation to which this advice refers) any privileged information available to you from your time in Government; 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 the Commonwealth Enterprise and Investment Council, or Apero Capital or its clients.

The Business Appointment Rules explain that the restriction on lobbying means that former Ministers should not engage in communication with Government – including Ministers, special advisers and officials – with a view to influencing a Government decision or policy [including applications for awards or grants] in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted.

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. Similarly, I should be grateful if you would inform us if you propose to extend or otherwise change your roles with CWEIC or Apero as depending on the circumstances, it might be necessary for you to seek fresh advice.

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 applications, 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

Rt Hon Sir Hugo Swire MP