

*From the Chair*



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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You asked for the Committee's advice about accepting a full time paid appointment as Director of Policy and Communications for Royal London Group.

When considering your application, the Committee took into account that you stated that during your time as Minister you met regularly with pension companies. This included Royal London, although you told us that this was only 'on occasion'. You stated that DWP had no special relationship with Royal London. DWP has confirmed that you met with Royal London on two separate occasions as Minister. You may also have met officials from the company at various conferences.

The Committee noted that you also met with competitors of Royal London. However, any commercially sensitive information was generally presented to you by DWP officials in an aggregated or anonymised form. You stated that in early 2015 you met several pension providers, including Royal London, to discuss the issue of high cost legacy pension schemes. Several companies provided detail about the extent of their exposure to this issue and their plans to deal with it, but you took no personal notes and retained no record of the meetings. Although you are now aware of the companies that have an issue with high cost

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legacy schemes, the information is well known in the industry already and this information would not give a provider a commercial advantage.

The Committee noted that you pushed through a policy to cap the cost of workplace pension schemes. This was opposed by Royal London.

Although Royal London will have engagement with government in the course of its business, you have informed us that it will not be part of your role with the organisation to be involved in such engagement.

However, given how closely your ministerial responsibilities were related to Royal London's business, the Committee believes that a waiting period would be appropriate.

The Committee noted with concern that unofficial reports about your role with Royal London had appeared in the press before its advice could be given. However, we did not believe that you or your new employer were at fault for this and, taking into account all the circumstances, we see no reason why you should not accept this appointment subject to the following conditions:

- that you should not draw on any privileged information available to you as a Minister;
- that there should be a six month waiting period from your last day in ministerial office and
- for two years from your last day in office, you should not become personally involved in lobbying the UK Government on behalf of your new employer, its parent company, its subsidiaries or its clients

It might be helpful if I add that 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 the appointment, 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 which 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 role with Royal London, as depending on the circumstances, it may be necessary for you to seek fresh advice.

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Once the appointment has 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.

Baroness Browning

The Rt Hon Steve Webb

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