



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

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You asked for the Committee's advice on accepting a part-time, paid appointment as Chief Operating Officer (COO) of the Counter Extremism Project (CEP).

The Committee noted that the CEP is a not-for-profit, non-partisan, international policy organisation set up to counter the extremism narrative and to shine a light on terrorist financing. The Committee also noted that you had had no official dealings with the CEP while in ministerial office. Your former department had no concerns about this appointment, as you had had little contact with the FCO's Prevent team on Combatting Violent Extremism and did not directly influence their policies or projects.

We see no reason why you should not accept this appointment subject to the following condition:

- you should not draw on any privileged information available to you from your time in Government;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK Government on behalf of your new employer, its parent company or its clients.

It might be helpful if I add that lobbying is defined in the Business Appointment Rules in the following way: "Lobbying in this context means that the former Minister should not engage in communication with Government - including Ministers, special advisers and officials - with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted".

In addition, the Committee noted that the nature of the work of the CEP means that it is

*From the Chair*

likely that you will engage in communication with the Government. However, having due regard for the lobbying ban does not prevent communications with Government on matters that are an integral part of the normal course of business of the CEP.

I should be grateful if you would inform us as soon as you take up this appointment or, if earlier, when 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.

Once an appointment has been publicly announced or taken up, we will include the main details, together with the Advisory Committee's advice on it and the date on which it was taken up, in both the regularly updated consolidated list on our website and in our annual report.

Baroness Browning

Mark Simmonds MP