



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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You asked for the Committee's advice about an appointment to join the Judging Panel for the Indigo Index Prize Competition.

The Committee's remit

As you know, it is the Committee's role to advise on any conditions that should apply to appointments or employment under the Government's Business Appointments Rules for Former Ministers (the Rules), which apply to former Ministers for two years after they leave office.

The Rules seek to counter suspicion that:

- a) the decisions and statements of a serving Minister might be influenced by the hope or expectation of future employment with a particular firm or organisation; or
- b) an employer could make improper use of official information to which a former Minister has had access; or
- c) there may be cause for concern about the appointment in some other particular respect.

When the Committee considers applications it must have in mind that Government has judged that it is in the public interest that former Ministers with experience in Government should be able to move into business or into other areas of public life, and to be able to start a new career or resume a former one. It is equally important that when a former Minister takes up a particular appointment or employment, there should be no cause for any suspicion of impropriety.

Consideration

You sought the Committee's advice about a role with the Indigo Index Prize (IIP). You were asked to be a member of the Judging Panel for the IIP by Mikhail Fridman, Chairman of a company called LetterOne, which is an international investment business based in Luxembourg, (making investments, through its various 'business units', in the Energy, Telecoms and Technology, Health and Retail sectors.

The Indigo Index refers to the Indigo Score, a measure by which countries can be assessed to determine how successful a country is. The idea behind this is that future economic performance of countries can no longer be predicted by forecasting GDP. Instead, other socio-economic factors could also be considered. LetterOne makes major investments in technology and Mr Fridman developed the IIP as part of his work on looking further at the impact that digital transformation is making to economies, and how to better measure the conditions in which tech businesses can thrive.

As a judge, you advised the Committee you will be attending a meeting to discuss the entrants, a final presentation and an awards ceremony, as well as giving consideration and feedback by email in the interim.

When considering the application, the Committee also took into account the following:

- You confirmed the role is part-time and unpaid, and will involve a time commitment of around two days each year.
- You were formerly the Minister of State for Digital and Culture - the Department for Culture, Media and Sport (DCMS) and the Department for Business, Energy and Industrial Strategy (BEIS) were therefore contacted regarding this application.
- You said that the role is unlikely to include any contact or dealings with your former Department or Government more generally and you confirmed that you did not have any official dealings with this organisation whilst you were in Ministerial office. This was confirmed by DCMS, who also confirmed that you do not have any commercially sensitive information that could be perceived to give LetterOne an unfair advantage; and that they had no concerns about you taking up this role.
- The Committee also took into account that BEIS confirmed that the Department of Energy and Climate Change (DECC), (which has now merged with BEIS,) did have some dealings with a business unit at LetterOne though these discussions were held with the Executive Chair of the business unit (L1 Energy) and not Mr Fridman; further BEIS confirmed there was no ongoing relationship and they have no concerns about the appointment.
- The Committee noted that this application, whilst connected to LetterOne, is solely related to becoming a judge for IIP.

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 any privileged information available to you as a Minister;
- for two years from your last day in service, you should not become personally involved in lobbying the UK Government on behalf of the Indigo Index Prize or LetterOne, its entities, or its partners, or make use, directly or indirectly, of your contacts in Government to influence policy or secure funding on behalf of the Indigo Index Prize or LetterOne, its entities, or its partners.

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 employment with this organisation, 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 Rules and the Ministerial Code.

Please 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.

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 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 Right Honourable Ed Vaizey