



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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You asked for the Committee's advice about taking up a position as a Non-Executive Director at Impellam Group Plc, a staffing company which provides managed services and specialist staff expertise primarily in the UK, Europe, Asia Pacific and North America.

The Committee noted that you described the role as a paid, part-time role as a member of the main Board - with a time commitment of one day per month. You said the Board will be responsible for corporate governance within the Group; including: overseeing the management of the Group's strategy; reviewing trading performance; ensuring adequate funding; maintaining internal controls and risk assessment; reporting to shareholders; and scrutinising the performance of management and determining appropriate levels of remuneration of executive directors, and their appointments.

When considering your application the Committee took into account that you confirmed you had no contact with Impellam Group during your last two years in office as Leader of the House of Lords (or in your Ministerial positions previous to that); and that the appointment is not likely to include any contact or dealings with Government.

The Permanent Secretary to the Cabinet Office was contacted about this appointment. He confirmed that Government (Department for Work and Pensions and Health Education England) has a working relationship with Impellam Group, but that you had no involvement in issues relating to this company in your capacity as Leader of the House of Lords. The Permanent Secretary had no concerns about the appointment.

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 from your time in Ministerial office;
- for two years from your last day in Ministerial office, you should not become personally involved in lobbying the UK Government on behalf of Impellam Group Plc, its subsidiaries or its partners. You should not make use, directly or indirectly, of your contacts in Government to influence policy or secure business on behalf of Impellam Group Plc, its subsidiaries 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

Rt Hon Baroness Stowell of Beeston MBE