



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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You asked for the Committee's advice about an appointment with International Group Management Limited.

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.

The Committee has now considered your application, as outlined below;

Adviser at International Group Management Limited (IGM)

The Committee noted that IGM is a company formed by the family owned International Group. IGM works internationally in: positioning, branding and implementing tailored sports and lifestyle facilities; providing solutions and reducing risks for developers of mixed-use leisure destinations, members' clubs, spas and luxury hotels; providing development advisory services; pre-opening management and training; event planning and delivery; and operational management.

You are seeking to join IGM as an Adviser. You explained this would be a paid, part-time role, which will require a time commitment of twelve days per year. You said you would be advising the company on its work in the leisure and esports industries, and represent IGM on the Advisory Board of the British Esports Association (you recently sought advice from the Committee about becoming President of this Advisory Board.)

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

- You were formerly the Minister of State for Digital and Culture. As with your previous application to join the Esports Association, the Department for Culture, Media and Sport (DCMS) and the Department for Business, Energy and Industrial Strategy confirmed you had no previous, official dealings with IGM itself; though you had previous official contact with Chester King in relation to Esports. (As well as being the CEO of the eGames Group and the Founder and CEO of the Esports Association, Mr King is also a Board Director at IGM.)
- DCMS also confirmed that you do not have any commercially sensitive information that could be perceived to give IGM an unfair advantage.
- Neither department has raised any concerns about this appointment.
- You note that it is unlikely that this role will include contact with Government. However, you have also confirmed that one of your responsibilities at IGM will be to represent it on the Advisory Board of the Esports Association. With this in mind, the Committee recognises from your previous application that DCMS and the Department for International Trade may be present as observers at Esports Association meetings. Therefore, you may have indirect contact with Government through the Esports Association.

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 International Group Management Limited, its parent company, (International Group) or its partners. This is not intended to prevent you from reporting to Government in your capacity as President of the Advisory Board of the Esports Association, or from advising the UK Government in that capacity in relation to esports when the UK Government has asked for such advice. However, it would prevent you from making use, directly or indirectly, of your contacts in Government to influence policy or secure funding on behalf of the British Esports Association Limited or International Group Management Limited, its parent company 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