



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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1. You approached the Committee about taking up an appointment as a member of the Advisory Board at UK Onward Thinktank Ltd.

The Committee's role and remit

2. As you will be aware, it is the Committee's role to advise on the 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:

- 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
- an employer could make improper use of official information to which a former Minister has had access; or
- there may be cause for concern about the appointment in some other particular respect.

3. 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.

4. It is not the Committee's role to pass judgment on whether an appointment is appropriate or suitable in any other regard.

Appointment details

5. You wish to take up an unpaid, part-time role as an Advisory Board Member at Onward Thinktank Ltd (Onward). Onward is a UK based think tank. The website states it is a powerful ideas factory for centre-right thinkers and leaders. It states the company exists to make Britain fairer, more prosperous and more united, '*... by generating a new wave of modernising ideas and a fresh kind of politics that reaches out to new*

groups of people'. It states to achieve this it will develop practical policies and has worked both at a high level in government and for successful think tanks.

6. You state that a member of the advisory board at Onward. She states the board sets the direction of the research which Onward will undertake in the future, and oversees the current research. You state this role might involve contact with government as some government ministers may speak at Onward events where you will be present.
7. You informed the Committee you had no official dealings with Onward during his last two years in office; was unaware of any contractual or non-contractual relationship between Onward and the Home Office; and had no access to commercially sensitive information about Onward's competitors.
8. The Permanent Secretary for the Home Office was consulted and confirmed to the Committee: Home Office has no relationship with Onward; you attended no official meetings with Onward and had no official dealing with Onward while in office.
9. The Permanent Secretary at the Home Office has no concerns about you taking up this appointment.

The Committee's consideration

10. The Committee¹ noted that you did not meet with Onward and was not involved in policy or funding decisions that could affect Onward while in office. The Committee therefore assessed the risk of this unpaid appointment being seen as a reward for decisions made in office as low.
11. When considering your application the Committee took into account that you were not involved in policy development that could have affected Onward. Thus, the Committee noted it was unlikely you would have any specific privileged information that could provide an unfair advantage to Onward. It did note there is an inherent risk that you could have had access to general policy decisions that could be seen to benefit Onward. However, the Committee believes this inherent risk is mitigated by the ban on the use of privileged information.
12. Additionally, given your seniority, the Committee noted that you would have had access to a wide range of contacts across Whitehall and within the Government. Therefore it would draw your attention to the restrictions below which makes it clear that you may not make use of your contacts gained in office to the unfair advantage of Onward.
13. Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advises the appointment with **UK Onward Thinktank LTD** be subject to the following conditions:
 - that you should not draw on (disclose or use for the benefit of yourself or the 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 Onward Thinktank

¹ This application for advice was considered by Sir Alex Allan; Jonathan Baume; Mike Weir; Lord Larry Whitty; John Wood; The Rt Hon Lord Eric Pickles; Dr Susan Liataud and Richard Thomas.

LTD (including parent companies, subsidiaries and partners), nor should you make use, directly or indirectly, of your government and/or Ministerial contacts to influence policy or secure funding/business or otherwise unfairly benefit Onward Thinktank LTD (including parent companies, subsidiaries, partners and clients); and

- for two years from your last day in office you should not advise Onward Thinktank LTD or its partners or clients on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of, the UK Government
14. 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 or otherwise.
 15. 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.*"
 16. I should be grateful if you would inform us as soon as you take up this 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 that 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 the organisation as depending on the circumstances, it might be necessary for you to seek fresh advice.
 17. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

Ms Seema Kennedy

The Rt Hon Lord Eric Pickles