



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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1. You approached the Committee for advice on taking up an appointment as a Senior Advisor to the Board at Veezu Ltd (Veezu).

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:

- 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.

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.

The Application

5. You sought the Committee's advice on taking up a paid, part-time position as a Senior Advisor to the Board of Veezu. Veezu is a private hire transport company located in Newport currently operating in 18 locations nationwide, providing taxi hire via an application.

6. You advised the Committee that you had no contact with and made no policy or regulatory decisions affecting the company. Nor did you meet with or have access to commercially sensitive information while in office.

7. The Welsh Office was consulted on this appointment and confirmed the details you provided were correct - you neither met, had involvement in, or had access to commercially sensitive information on Veezu or their competitors. The Welsh Office added it has a contract with Dragon Taxis, however confirmed you *'played no part in either instigating or awarding that contract and he was not involved in discussions about it'*. The Welsh Office's view was that this role raised no concerns under the Government's Business Appointment Rules.

The Committee's consideration

8. Both you and the Welsh Office confirmed you had no involvement in policy and no official dealings with Veezu while in office. The Committee¹ noted the Welsh Office had no concerns on you taking up this appointment and considered the risk this appointment could be seen as a reward for decisions taken in office is low.

9. The Committee noted there is a low but inherent risk of unfair advantage in relation to access to the contacts you gained while in Ministerial office. The lobbying ban imposed below makes clear that it would be inappropriate for you to use your contacts across the UK Government to the unfair advantage of Veezu. The Committee would also like to draw your attention to the ban on providing advice on bids and contracts relating to the work of the UK Government, including with regard any funding Veezu may wish to seek.

10. The Committee considered there is a risk you may confer an unfair advantage to Veezu due to your access to general sensitive information gained as Secretary of State. The Committee noted the Welsh Office did not consider you had access to any specific information that was likely to provide an unfair advantage to Veezu and that it has been over 7 months since you have left office which has reduced the risk that any information may confer an unfair advantage. It therefore considers the below conditions sufficiently mitigate the risks in this case.

11. In accordance with the Government's Business Appointment Rules, the Committee advises this appointment with Veezu Ltd be subject to the following conditions:

- that you should not draw on (disclose or use for the benefit of yourself or the organisation to which this advice refers) any privileged information available to you from Ministerial office.

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

- for two years from your last day in Ministerial office, you should not become personally involved in lobbying the UK or Welsh Government on behalf of Veezu Ltd (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the UK or Welsh Government and/or Ministerial office to influence policy, secure business/funding or otherwise unfairly advantage Veezu Ltd (including parent companies, subsidiaries, partners and clients); and
- for two years from your last day in Ministerial office you should not advise Veezu Ltd (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid or contract relating directly to the work of the UK or Welsh Government.

12. 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.

13. 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.*"

14. 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.

15. 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.

The Rt Hon Lord Pickles

Rt Hon Alun Cairns MP