



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

Room G/8, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

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1. You sought the Committee's advice about taking up a role with the Human Trafficking Foundation (The Foundation).

The Committee's remit

2. 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.
3. 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.
4. 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.

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

Appointment details

6. You wish to take up an unpaid, part-time role as Trustee of the Foundation, which described itself as non-profit making, working to help victims of Human Trafficking and Modern Slavery. The Foundation grew out of the All-Party Parliamentary Group on Human Trafficking and Modern Slavery with objectives including to '*shape policy and legislation by equipping parliamentarians and policy makers, lead government departments, local authorities, police and statutory agencies to better understand human trafficking*', and other NGO and voluntary organisations fighting modern slavery. You stated your role will be to be a Member of the board of Trustees, which could include contact with the Government given the organisations's purpose - to help improve policy on human trafficking and modern slavery.
7. You stated you neither met with, had access to sensitive information about, nor made any decisions regarding the Foundation or others operating in the same space while in office.
8. The Northern Ireland Office was consulted regarding this appointment and confirmed there is no evidence Ms Bradley had any form of contact, or made decisions regarding The Foundation. The NIO stated no concerns about this appointment.

The Committee's Consideration

9. When considering your application, the Committee¹ took into account that this role is unrelated to your role in office and you had no official dealings or made any decisions regarding the Foundation in office. The Committee considered the risk you were offered this role as a reward for a decision made or actions taken in office is low.
10. The Committee noted that due to your seniority, you would have gained knowledge of privileged information that could confer an unfair advantage to any organisation, which is prohibited from being used, given the condition which prevents the use of privileged information ban below. The Committee considered it would also be inappropriate should you advise The Foundation on a bid or contract relating to the Government, which fits in line with your role as Trustee.
11. The Committee recognises that The Foundation works with leading with UK departments on policy relating to Human Trafficking. You confirmed that your role will not include lobbying the Government, though may have close contact given its role. The lobbying ban below makes it clear it would be inappropriate for you to use your contacts gained in office for the unfair advantage of the Foundation - this would not prevent you from reporting on the Foundation's activities in an open and transparent way or where the Government requests it.
12. The Committee recognised that as a member of the House of Commons you may raise issues on Human Trafficking. Your actions as an MP are not for the Committee

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

to consider and you will be bound by the rules governing all Members of Parliament and their conduct (such as the requirement to register your interests).

13. Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises this appointment 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.
- for two years from your last day in Ministerial office, you should not become personally involved in lobbying the UK Government on behalf of the Human Trafficking Foundation (including parent companies, subsidiaries, partners and clients). This would not prevent you from reporting to Government on the activities of the Human Trafficking Foundation, but it would prevent you from making use, directly or indirectly, of your contacts in Government to influence policy, secure funding/business or otherwise unfairly benefit of the Human Trafficking Foundation (including parent companies, subsidiaries, partners and clients); and
- for two years from your last day in Ministerial office you should not advise Human Trafficking Foundation (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 Government.

The Committee also notes that in addition to the conditions imposed on this appointment, there are separate rules in place with regard to your role as a member of the House of Commons.

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 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.

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 Karen Bradley MP