



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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1. You sought the Committee's advice about taking up a role with the StepChange Debt Charity as a Political Advisor.

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 sought the Committee's advice on taking up an unpaid and part time position as a Political Advisor at StepChange Debt Charity (StepChange).

7. You said StepChange provides free advice and support on managing personal debt to the public and running policy campaigns and briefings to Parliamentarians on debt-related issues. The website states it is a charity that provides free debt advice that is based on a comprehensive assessment of an individual's situation. It will then provide practical help and support for however long it's needed. You said you would be advising the Board, Chief Executive and working with the StepChange policy team on how the current political landscape and likely policy developments and forthcoming legislation and regulation may affect their work and services offered. You do not expect your role to involve contact with the Government.

8. You confirmed you had no official contact with StepChange whilst Secretary of State at DCMS; and that you hold no sensitive information related to StepChange. You confirmed you made no relevant policy decisions or development affecting StepChange and there is no relationship between StepChange and your former department, the Department for Media, Culture and Sports (DCMS).

9. DCMS confirmed the details provided in your application and informed the Committee debt advice policy and funding sits with HM Treasury and Department for Work and Pensions, not DCMS. It further confirmed you did not have access to unannounced policy or information of sensitivity that could unfairly benefit StepChange. The department has no concerns with you taking up this role.

The Committee's consideration

10. The Committee took into account you had no contact with StepChange nor involvement in relevant decisions affecting StepChange. It therefore assessed the risk that you may have been offered this role as a reward for actions taken in office as low.

11. The Committee noted there is no overlap with your time in office and your proposed role. Further DCMS confirmed it has no concerns with you taking up this appointment. The Committee did not consider this appointment raises any particular proprietary concerns under the Government's Business Appointment Rules. While there are inherent risks associated with your general access to sensitive information and contacts in government, the standard conditions below, preventing you from drawing on your privileged information and using your contacts to the unfair advantage of your new employer, will sufficiently mitigate the risks in this case.

12. Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises this appointment with **StepChange Debt Charity** 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 StepChange Debt Charity (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the Government and/or Ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage StepChange Debt Charity (including parent companies, subsidiaries, partners and clients);

- for two years from your last day in office you should not advise the StepChange Debt Charity (including parent companies, subsidiaries, partners and 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.

13. 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 Lords.

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, the Civil Service Code 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. 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 Lords.

17. I should be grateful if you would inform us as soon as you take up this role, 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.

18. 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.

19. Once the 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

The Baroness Morgan of Cotes