



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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January 2021

1. You approached the Committee for advice on taking up an appointment as Co-Chair, Climate and Energy with Public Policy Projects 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:

- 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 Co-Chair, Climate and Energy with Public Policy Projects Ltd (PPP). You said PPP is a subscription-based global public policy institute, based in London, UK. You said the executive Chair of PPP, The Rt Hon Stephen Dorrell, and Co-Chairs, Baroness Nicola Blackwood and Stephen Hammond MP offer practical policy analysis and development. You said PPP is independent and cross-party, bringing together public and private sector leaders, investors, policymakers and commentators with a common interest in the future of public policy. PPP provides policy thought leadership across health, social care, life sciences, digital, infrastructure, rail, space and climate sectors.

6. You told the Committee that in the run up to COP26¹ in November 2021, PPP will be producing a significant report on maximising the impact of COP26 through a series of meetings. A series of international perspectives and case studies will be curated on a range of different aspects of the climate debate. You said the report will be informed by a number of events and roundtables. You told the Committee PPP's purpose is to create an international forum bringing together governments, diplomats and the private sector to exchange policy ideas and thought leadership. You said as Chair of this report, you will be hosting many of these events and roundtables as well as providing strategic policy guidance to PPP on the appropriate avenues of enquiry for the report to investigate. You confirmed you will not be lobbying the government. You stated *'Whilst this role is a more internationally focused role, the UK is hosting COP26 and therefore Government officials and Ministers will be asked to speak at various engagements including the report launch and at roundtables. The team at PPP will organise the meetings however and I will not be directly involved, except as Chair'*.

7. You advised the Committee that you had no contact with and made no policy or contractual decisions specific to the organisation. You further confirmed you did not have access to sensitive information relevant to PPP; nor did you meet with or have access to commercially sensitive information regarding competitors of PPP while in office.

8. The Department for Work and Pensions (DWP) were consulted on this appointment and confirmed the details you provided were correct. It also confirmed you had no access to sensitive information that it considered could offer an unfair advantage to PPP. DWP confirmed it had no concerns with you taking up this appointment.

The Committee's consideration

¹ COP26 is the 26th United Nations Climate Change conference.

9. DWP confirmed you had no involvement in policy or contractual decisions specific to PPP while in office. The Committee² noted DWP has a relationship with PPP and had any concerns about you taking up this appointment. The Committee therefore considered the risk this appointment could be seen as a reward for decisions taken in office is low.

10. The Committee noted as the former Secretary of State at Department for Work and Pensions you would have had access to privileged information which may be seen to offer an unfair advantage to any organisation, including PPP. However, the Committee gave weight to DWP's comments that they have no concerns relating to your access to sensitive information. Further, the Committee noted the amount of time that has passed since you were in office (over 16 months). The Committee also took into account you are prevented from drawing on your privileged information as with all former ministers which helps to mitigate the inherent risks with your access to information.

11. The Committee also noted the risk that the contacts you gained while in ministerial office could provide an unfair advantage to PPP. The Committee noted you will have contact with government as officials and ministers will be asked by others at PPP to speak at various engagements including the report launch and at roundtables that you will chair. The Committee would draw your attention to the lobbying ban imposed below, and add that it considered it would be inappropriate for you to initiate contact between PPP and the UK Government. To do so would risk offering her new employer an unfair advantage via influence and contacts gained within Government and across Whitehall as a result of your former role in government. The Committee recognised this is in keeping with your description of the role and your confirmation you will not be involved in lobbying or reaching out to the Government.

12. In accordance with the Government's Business Appointment Rules, the Committee advises this appointment with **Public Policy Projects 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;
- for two years from your last day in Ministerial office, you should not become personally involved in lobbying the UK Government on behalf of Public Policy Projects Ltd (including clients, parent companies, subsidiaries and partners); nor should you on make use, directly or indirectly, of Government/Whitehall contacts to influence policy, secure funding/business or otherwise unfairly

² This application for advice was considered by Jonathan Baume; Dr Susan Liautaud; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir; Lord Larry Whitty; Sarah de Gay; Isabel Doverty and Andrew Cumptsy.

advantage Public Policy Projects Ltd (including client parent companies, subsidiaries and partners); and

- for two years from your last day in Ministerial office you should not provide advice to Public Policy Projects Ltd (including parent companies, subsidiaries, partners and clients), in relation to the terms of a bid with, or contract relating directly to the work of the UK Government.

13. 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.

14. 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.*"

15. 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. 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.

16. 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

The Rt Hon Amber Rudd