



## 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](mailto:acoba@acoba.gov.uk)

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

George Freeman MP  
House of Commons  
London  
SW1A 0AA

April 2021

Dear Mr Freeman

I am writing to you with reference to your work with Haemcro and your associated request for advice.

### **The Government's Business Appointment Rules (the Rules)**

The Rules apply by virtue of the Ministerial Code, which states (in paragraph 7.25) that Ministers must '*seek advice from the independent Advisory Committee on Business Appointments (ACoBA) about any appointments or employment they wish to take up within two years of leaving office. Former Ministers must ensure that no new appointments are announced, or taken up, before the Committee has been able to provide its advice.*'

The Committee advised you in December 2020 that you were in breach of the government's Rules for failing to seek advice in relation to your work with Aerosol Shield Ltd. The Committee asked you to tell us about any other work you have undertaken without consulting the Committee in advance. You informed us of a number of other roles<sup>1</sup> and have now confirmed you have made the Committee aware of all other roles.

### **Haemcro**

---

<sup>1</sup> You have informed us about work relating to: Ryse Hydrogen Limited, Resume Foundation, Reform for Resilience, Haemcro, The Norfolk Way, The Bridge of Hope and The Big Tent.

You seek advice on joining Haemcro as a Chairman, you said this role would be unpaid – with the intention that, if it can secure funding, it will become a paid role. Haemcro is a start-up organisation focussed on blood cancer research. You said Haemcro is an organisation being set up to help provide UK blood cancer patients with faster access to ‘...*novel diagnostics and therapies, through the creation of a specialist digital clinical network of patients and researchers in the UK blood cancer network*’. You said it was founded by Professor Craddock, the Cure Leukaemia Charity, the Anthony Nolan Foundation and NHS blood transfusion. However, you also informed the Committee that before being invited to join as Chairman of the organisation, you advised the organisation/ Professor Craddock on business planning and development, support with structure strategy and corporate finance, recruitment, team development, corporate governance and fundraising. You were providing this advice for nine months before seeking advice from the Committee.

The Committee recognises from your correspondence that you wanted to apologise to the Committee for not seeking its advice initially. You said it had been a misunderstanding of your responsibilities under the business appointments process - you erroneously thought advice was only required for commercial work which might have a connection with your former ministerial portfolio. You said you did not seek advice for this role with the Reform for Resilience as it was unrelated to your former ministerial portfolio.

The Committee recognised this role raises no known direct conflict with your time as Minister of State at the Department for Transport. Nevertheless, you were required to seek and await the Committee’s advice in advance of accepting a role or taking on work. Failure to seek and await advice in this case was a breach of the Government’s Rules and the requirement set out in the Ministerial Code. The Committee recognised this was a mistake on your part which you have apologised for. However, it refuses to provide advice in such cases and it sees no extenuating circumstances to advise in this case.

The Committee would take this time to remind you of your ongoing responsibilities as a former minister of the Crown and a Member of Parliament. You are expected to uphold the highest standards of propriety and act in accordance with the Ministerial Code and the 7 Principles of Public Life.

In line with the Committee’s policy of transparency, correspondence on this matter will be published on our website; and this letter will be copied to the Cabinet Office, as the owner of the Rules.

The Rt Hon Lord Pickles

Mr George Freeman MP

---

**Relevant correspondence, from letter dated 17th March 2021 from George Freeman**

Dear Lord Pickles,

Application for approval for new start up projects on post-Covid recovery and Regeneration. Thank you for your helpful advice following our recent exchange of letters. I wanted to apologise again for my misunderstanding of the ACOBA process and to reiterate that I genuinely didn't understand that ACOBA guidance was needed for any/all work embarked upon by former Ministers (including for charities and not-for-profit projects). I thought it only applied to commercial work which might have any connection with my former Ministerial portfolio.

Please find attached Application Forms for:

- four roles relating to my various pro-bono not-for-profit projects on post-Covid regeneration:
  - The Reform for Resilience Commission: an international not-for-profit alliance project to make the case for a stronger commitment by international governments post-Covid to population health resilience;
  - The Resume Foundation / Prosper 4 Jobs: a private-public skills alliance for training the hard-to-reach long term unemployed;
  - HAEMCRO: the not-for-profit blood cancer clinical research Social Enterprise;
- The Norfolk Way
- The Norfolk Enterprise Festival
- The Big Tent Foundation
- The Bridge of Hope

## **Background**

### **Not-for-Profit Projects**

On leaving Government unexpectedly last February, I have been working to help these existing projects survive the Covid charity financing crisis: restructuring them so as to survive, secure new funding and be able to help the post-Covid economic recovery emergency we will soon face. To that end I have been exploring through the last 9 months a number of ways to help support the post-Covid recovery and the UK's ability to shape post-Covid 'healthier and cleaner growth'. Through that a number of projects have started to take shape which being not-for-profit and unrelated to my previous role I simply didn't realise I needed ACOBA permission to work but which I now understand I do. (If they were straightforward commercial 'Appointments' or 'Employment' I would have filled in an ACOBA application form – as I have now (attached) but as speculative new not-for-profit projects I genuinely wasn't clear from the Ministerial guidance that these all needed ACOBA approval.

You asked me to explain the background to my work on Hydrogen and the proposed work (now no longer proposed) helping RYSE assess the commercial feasibility of industrial hydrogen conversion.

As an East Anglian MP I've been very concerned about the proposal for multiple point-to-point connections of offshore wind energy via multiple sub-stations on the East Anglian coast, and arguing that we would be better with a single connection which could also support a large scale hydrogen hub for East Anglia. Through that work I had suggested and offered to help RYSE develop a business plan for the conversion of Hydrogen to help create an East Anglian commercial market for green hydrogen in the heavy equipment sectors of agriculture and agri-haulage, which I have long commercial experience of given my professional career in AgriTech.

As explained to ACOBA officials, as soon as I understood that any work like this has to be agreed with ACOBA before being confirmed, I terminated the contract. No payment has been received and with the pace of developments in hydrogen conversion in the last three months, no ongoing work on assessing commercial feasibility to facilitate conversion is now proposed or planned, and this project no longer exists.

Given the specific circumstances of this case and my apology – repeated here – for misunderstanding the process, I hope the Committee will understand that whilst I was remiss in not seeking guidance earlier, there is nothing in the actual work which contravenes the ACOBA guidelines, and that given no work has been done and no payment received, the Committee will agree that the case is now closed.

### **Request for ACOBA Approval.**

Your officials have been extremely helpful in going through all these projects and advising how best to proceed, and that I should apply formally with a cover letter to explain the particular circumstances of these projects to seek ACOBA approval.

I hope and trust this letter explains why I am now applying to ACOBA for approval of my proceeding with these projects so that I am not continually reported in the media as 'in breach of the anti-corruption watchdog for failing to register them properly (for which I apologise again), and that given the nature of these projects and the background you and the Committee feel able to grant approval so that:

- the pro-bono projects can continue

Yours,

George Freeman.

George Freeman MP  
Member of Parliament for Mid Norfolk