



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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**BUSINESS APPOINTMENT APPLICATION: THE RT HON CLAIRE PERRY MP**

1. The Committee has considered your application to take up a role with the World Business Council for Sustainable Development.

The Committee's role and 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 advice on working for the World Business Council for Sustainable Development (WBCSD), a member-based group of global private sector corporations who are active in driving the sustainability agenda. Its website states it is a '*global, CEO-led organization of over 200 leading businesses working together to accelerate the transition to a sustainable world.*' The collective worth of these companies is \$8.5 trillion with 19 million employees.

7. You intend to take up the role as Managing Director for Global Climate Energy and Natural markets. You stated this would not involve any contact with the Government. You were offered this role via a third party introduction. You stated you had no official dealings with WBCSD whilst in office, but noted you would have attended events where they were present. You said you had no official dealings (involvement in policy or contractual decisions) that would have affected WBCSD.

8. The Department of Business, Energy and Industrial Strategy (BEIS) was consulted on this appointment. It confirmed that you had no involvement with WBCSD beyond attendance at events where they may have been present and that you had no involvement in policy that would have directly affected WBCSD. However, you could have had involvement in broad policies, such as the UK's commitment to net zero. BEIS also told the Committee you were involved in the Energy White Paper which has not yet been published. It confirmed you had no involvement in any contractual or commercial decisions and it has no formal relationship with WBCSD.

9. Due to your role as COP26 President, COP26 was also consulted on this appointment. It stated that you had contact with Joe Phelan, Director at WBCSD India, on behalf of COP26 during a trip to India. You also attended a large panel event of 40 people at the World Economic Forum at Davos on the 21 January 2020 with WBCSD also attended. It confirmed you had no policy responsibilities as part of your role in COP2, nor involvement in any budgetary decisions. COP26 had no concerns about you taking up this work, noting policy had moved on and become public since your short time in post (September 2019-February 2020).

#### The Committee's Consideration

10. The Committee considered that this role with WBCSD, is in keeping with the terms of your independent consultancy as you described it as focusing on climate, energy and sustainability.

11. The Committee considered that as you had no official contact with WBCSD whilst you were in office, and made no decisions specific to WBCSD, the risk that this appointment is a reward for actions taken in office is low.

12. The Department and COP26 registered no concerns about your access to sensitive information, such as unannounced policy that might be of advantage to WBCSD or its members. However, there are inherent risks given the overlap in your ministerial responsibilities, such as your involvement in the Energy White Paper and WBCSD's work. The risk here is broad and relates to any organisation operating within energy, climate and sustainability, rather than being a specific conflict related to WBCSD. The Committee noted the risk is partly mitigated because it has been over a year since you had involvement in this policy and access to this information. However, the Committee considered it would be appropriate to draw your attention to the ban on using privileged information (including from your time at COP 26) imposed below.

13. The Committee considered your ministerial network, and the influence this may be perceived to offer WBCSD given its interest in government policy in the area you held responsibilities as a Minister. While the Committee recognises you do not plan to have contact with the UK Government in this role, it would remind you of the ban on lobbying the UK Government that applies to all former ministers. This includes indirectly through use of your contacts, as the conditions below set out.

14. In accordance with the Government's Business Appointment Rules, the Committee advises this role with **World Business Council for Sustainable Development** be subject to the same conditions as your independent consultancy:

- that you should not draw on (disclose or use for the benefit of yourself or the organisations to which this advice refers) any privileged information available to you from your time in office;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the Government on behalf of those you advise under your independent consultancy (including clients, parent companies, subsidiaries and partners). Nor should you make use, directly or indirectly, of your government and/or Ministerial contacts to influence policy, secure funding/business or otherwise unfairly benefit those you advise under your independent consultancy (including clients, parent companies, subsidiaries and partners);
- for two years from your last day in ministerial office, you should not provide advice to any company or organisation on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the UK Government; and
- for two years from your last day in ministerial office, before accepting any commissions for your independent consultancy and or/before extending or otherwise changing the nature of your commissions, you should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.

15. 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 or otherwise.

16. 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."

17. We should be grateful if you would ensure that we are informed as soon as you take up this position, 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 which have not been taken up or announced, and this could lead to a false assumption being made about whether you have complied with the Rules.

18. You must also inform the Committee if you propose to extend or otherwise change the nature of this commission as, depending on the circumstances, it may be necessary for you to make a fresh application.

19. Once this commission has been publicly announced or is live 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 Claire Perry