



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former ministers (the Rules) seeking advice on taking up an appointment as a Chair of the UK Abraham Accords Group (the Group). The material information taken into consideration by the Committee is set out in the annex.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during time in office, alongside the information and influence a former minister may offer the group.
3. The Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

The Committee's consideration of the risks presented

4. When considering this application, the Committee¹ took into account this role as Chair of the Forum is unpaid². Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of the government by considering the real and perceived risks associated with former ministers using privileged access to contacts and information to the benefit of themselves or those they represent; and to mitigate the risks that individuals may make decisions or take action in office to in expectation of rewards, on leaving government. These risks are

¹ This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Sarah de Gay; Isabel Doverty; Dr Susan Liautaud; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir and Lord Larry Whitty.

² By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

significantly limited in unpaid cases due to the lack of financial gain to the individual.

5. The Committee took into account that you did not meet with the group itself but did meet with the governments of Bahrain, the UAE and Israel while in office as part of your role as Secretary of State at the Department for International Trade (DIT); and you had similar contact with other foreign governments. The Committee noted you had responsibility for trade policy decisions which DIT confirmed would not have directly affected the group (as it is newly established), but would likely have affected various governments including those of Bahrain, Israel and the UAE.
6. There is a general overlap here with your time in office. Therefore, there could be a perceived risk you have access to relevant privileged information and knowledge, which could unfairly benefit this group. However, the Committee noted the amount of time that has passed since you were in office and the unpaid nature of this appointment limits the real and perceived risk of individuals making improper use of information they had access to while in office for their personal benefit. Further, the Committee noted the Foreign, Commonwealth and Development Office (FCDO) strongly supportive of the organisation and this role. You also have an ongoing duty of confidentiality.
7. As above the Committee recognised that the risks in this unpaid appointment are limited. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. The standard conditions below, preventing you from drawing on your privileged information and using your contacts to the unfair advantage of their new employer, will sufficiently mitigate the risks in this case.

The Committee's advice

8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **the UK Abraham Accords Group** 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 the UK Abraham Accords Group (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage the UK Abraham Accords Group (including parent companies, subsidiaries, partners and clients); and
 - for two years from your last day in ministerial office you should not undertake any work with the UK Abraham Accords Group (including

parent companies, subsidiaries, partners and clients) that involves providing advice 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.

9. 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.
10. 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.
11. 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.*" This Rule is separate and not a replacement for the Rules in the House.
12. 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. 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.
13. 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.
14. 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 Rt Hon Dr Liam Fox MP

Annex - Material information

The role

1. The Abraham Accords are a joint statement between Israel, the United Arab Emirates, and the United States, reached on 13 August 2020.

2. The three countries wish to create a forum (the Group) through which they and others that share their aspirations can engage with Parliamentarians to discuss and promote these accords and the wider cause of peace across their region. The aim of this group is to seek further public knowledge about the historic peace agreement and, through research, events, and visits to the region, to assist relevant and interested UK parties in gaining deeper understanding and exploring the new pathways of cooperation, peace-making and economic prosperity made possible by the Accords. It will do this through:

- Events: Roundtables, panel discussions, exhibitions, guest speakers and lectures/speeches. Focussed on trade, interfaith, civil society and peace.
- People-to-people activities: bringing together promising young Emiratis, Bahrainis and Israelis.
- Research Briefings: Regular briefings about progress on the accords, addressing key issues.
- Visits: Tel Aviv/Manama/Abu Dhabi visits to view visible changes the accords are bringing about and meet with politicians, officials, businesses and citizens experiencing the accords' visible results.

3. The Group will also be setting up a limited company called 'Middle East Forum'. This company will handle the money for the initiative. The directors will include Lord Polak, President of Conservative Friends of Israel, Lord Mendelsohn, former chairman of Labour Friends of Israel, and Will Neal, who works with Pall Mall Communications.

4. You said you received an invitation to Chair a UK group to support the aims of Bahrain, Israel and UAE expressed in the Abraham Accords, from:

- HE Fawaz bin Mohammed Al Khalifa, Ambassador of Bahrain to the UK
- HE Mansoor Abulhoul, Ambassador of the UAE to the UK
- HE Tzipi Hotovely, Ambassador of Israel to the UK

You said the role will be to oversee the initiative, presiding at events, taking part in overseas visits, and generally supporting the Abraham Accords. You do not expect your role to involve contact with government.

5. You said as Secretary of State for DIT, you visited Bahrain, Israel and UAE but the Abraham Accords did not exist until about a year after you left office. You stated you had no official dealings with the UK Abraham Accords Group, Middle East Forum - which was not yet established

Department Assessment

6. DIT said that as Secretary of State for International Trade, you would have had responsibility for trade policy decisions. It stated these would not have directly affected this group as it has not yet been established – however they would likely have affected the governments of Bahrain, Israel and the UAE, who are establishing this group.

7. DIT also stated you will have had contact with the governments of Bahrain, Israel and the UAE in your role as Secretary of State for International Trade.

8. DIT said as the Group will be promoting the Abraham Accords and there may be other groups promoting engagement between Arab countries and Israel. It noted it was possible you had contact with such groups as Secretary of State for International Trade.

9. DIT stated that as the former Secretary of State for International Trade and a Cabinet Minister, you would have had access to certain privileged information that would have related to the governments of Bahrain, Israel and the UAE, who are establishing the group. However, this information will most likely be outdated given you left your role as Secretary of State in July 2019

10. The department said that as the group *'...has not yet been established and therefore has no existing relationship with the Department, that any relationship would have been with the governments of the proposed employers rather than the individuals themselves and the time passed since the applicant left the role, [it] think[s] it would be unlikely that any significant issue would arise with the applicant taking up this appointment'*.

11. ACOBA also contacted the FCDO regarding this appointment. It said *'HMG is strongly supportive of the Abraham Accords. [It] want[s] to help make them a success and a platform for further normalisation between Israel and other states. Having a former Secretary of State in the role of chairman would appear to support these aims'*.