



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

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November 2020

1. You approached the Committee for advice on taking up an appointment as a Consultant with This is Purpose.

### 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 Consultant with This is Purpose. You said This is Purpose is a political and public relations consultancy. The website states it is an environmental, social and governance consultancy '*...specialising in helping organisations put people and planet at the core of their purpose*'. You said as a consultant you will be advising universities and businesses on their approach to loneliness and isolation amongst their students, employees and communities. You do not expect the role to involve contact with government.

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

7. The Home Office and Department for Health and Social Care (DHSC) were consulted on this appointment and it was confirmed the details you provided were correct - you neither met with, had involvement in, or had access to commercially sensitive information on This is Purpose or its competitors. Neither department had any concerns with you taking up this appointment.

#### The Committee's consideration

8. The Home Office and DHSC confirmed you had no involvement in policy and no official dealings with This is Purpose while in office. The Committee<sup>1</sup> noted neither department had any concerns about you taking up this appointment and considered the risk this appointment could be seen as a reward for decisions taken in office is low.

9. The Committee noted that this appointment is not directly related to policy or regulation from your time in office, and is drawing on knowledge, skills and experience from your time in government. However, it noted there is an inherent risk of unfair advantage in relation to your access to general sensitive information gained in office. The Committee noted neither DHSC nor the Home Office have any concerns relating to access to any specific information likely to provide an unfair advantage to This is Purpose. The Committee therefore considers the below condition preventing you from drawing on your privileged information would sufficiently mitigate the risk in this case.

10. The Committee further noted the risk that the contacts you gained while in Ministerial office could provide an unfair advantage to This is Purpose. However, you stated the role will not involve contact with the Government and the lobbying restriction, below, makes clear that it would be inappropriate for you to use your contacts across the UK Government to the unfair advantage of This is Purpose. The Committee would also like to draw your attention to the ban on providing advice on bids and contracts relating to the work of the UK Government.

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<sup>1</sup> This application for advice was considered by Sir Alex Allan; Jonathan Baume; Dr Susan Liautaud; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir; Lord Larry Whitty and John Wood.

11. The Committee also noted there may be potential risks associated with the unknown nature of This is Purpose's clients. Specifically, should they be a company or organisation you or DHSC/Home Office had a commercial relationship with or where you had some influence in respect of their work whilst in post. Therefore, the Committee considered it would be appropriate to impose an additional condition to prevent you from advising This is Purpose's clients where it involves working on matters you had involvement with in office.

12. In accordance with the Government's Business Appointment Rules, the Committee advises this appointment with **This is Purpose** 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 This is Purpose (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the Government and/or Ministerial office to influence policy, secure business/funding or otherwise unfairly advantage This is Purpose (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in Ministerial office you should not advise This is Purpose (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid or contract relating directly to the work of the UK Government; and
- for two years from your last day in ministerial office, you should not advise This is Purpose or its clients on work with regard to any policy you had specific involvement or responsibility for as Parliamentary Under Secretary of State for Immigration at the Home Office or as Parliamentary Under Secretary of State for Public Health and Primary Care at DHSC or where you had a relationship with the relevant client during your time as Parliamentary Under Secretary of State for Immigration at the Home Office or as Parliamentary Under Secretary of State for Public Health and Primary Care at DHSC.

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, 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 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

Seema Kennedy OBE