



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 establish an independent consultancy alongside your commission to work with Ikigai Energy.

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 Ikigai Energy, a UK-based private energy, consultancy and investment advisor. Its website states it is part of the wide Ikigai

organisation with Ikigai Capital and Ikigai Axl, which are focused on different investment areas. Ikigai Energy is the development arm that structures, funds and manages solutions to solve energy challenges.

7. You are proposing you take up a role as **Non-Executive Board Member and Advisor**. You stated this would not have any contact with Government. You stated you had no official dealings with Ikigai whilst in office, but noted you had contact with one of the co-founders, Helena Anderson whilst she was at DiT. You did not mention any involvement in policy that would directly affect Ikigai.
8. The Department of Business, Energy and Industrial Strategy (BEIS) was consulted on this appointment. The Department confirmed you did not meet with Ikigai Energy during your time in office and did not award any contracts or funding to Ikigai Energy. The Department did also note that as Minister of State for Energy and Clean Growth, you would have been privy to various policies in development which would be of interest to Ikigai, most significantly the Energy White Paper which has not yet been published.
9. Due to your role as COP26¹ President, COP26 was also consulted on this appointment. It stated that you had no contact with Ikigai Energy in your role as President. It confirmed you had no policy responsibilities as part of your role in COP2, nor involvement in any budgetary decisions and overall had no concerns

The Committee's Consideration

10. The Committee² noted that as you had no contact with Ikigai Energy whilst in office, did not award any contracts to the company or make any regulatory decisions that would have specifically affected the company, the risk that this appointment may be a reward for actions taken whilst in office is low.
11. The Committee considered there is a risk with regards to your Ministerial and COP26 networks, and the influence you may wield through this particularly given Ikigai Energy has an interest in the areas that you worked in. The lobbying condition in place on your independent consultancy prevents you from offering an unfair advantage to Ikigai by giving them undue access to government figures. The condition on bids and contracts also in place on your independent consultancy means you may not assist advise on the procurement of any Government work for Ikigai Energy or its clients.
12. COP26 registered no concerns about your access to sensitive information, such as unannounced policy that might be of advantage to Ikigai or its clients. However, there are inherent risks given the overlap in your ministerial responsibilities, with the Department noting your involvement in the upcoming Energy White Paper. The risk here is broad and relates to any organisation operating within energy, climate and sustainability, rather than being a specific conflict related to Ikigai. 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

¹ COP26 is the 26th UN Climate Change Conference. It is scheduled to be held in Glasgow, Scotland from 1 to 12 November 2021.

² This application for advice was considered by Sir Alex Allan; Jonathan Baume; Richard Thomas; Mike Weir; Lord Larry Whitty and John Wood. The Rt Hon Lord Pickles and Dr Susan Liautaud were absent.

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. In accordance with the Government's Business Appointment Rules, the Committee advises this role with **Ikigai Energy** 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 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.
14. 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.
15. 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."
16. 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.

17. 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.
18. 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