



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 a paid role as a Senior Advisor with Public Policy Projects (PPP). The material information taken into consideration by the Committee is set out in the below 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 PPP.
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 risk presented

4. The Committee¹ took into consideration that you did not have any official contact with PPP whilst in office and you did not make any policy or contractual decisions that would have specifically affected PPP. The risk that this appointment is perceived as a reward for actions taken in office is therefore low.
5. The Committee noted aspects of your role with PPP may broadly overlap with your time as Minister of State - namely, sectors you had responsibility for as minister that you seek to work on, for instance, the Sciences. As such there is a risk you could have access to information that could provide an unfair advantage to PPP. However, the Committee gave weight to the department's confirmation it did

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

not consider there to be risks relating to your access to information and noted the 17 months that have now passed since you left ministerial office. Further, the department recognised that as minister, you would have gained contacts which, if used to lobby the government, would provide an unfair advantage. You stated PPP is not itself involved in lobbying and proposed your role will have no involvement with the government.

The Committee's advice

6. The conditions below make it clear you are prevented from using privileged information or lobbying the government directly or through other parties, sufficiently mitigating the risks above.

7. In accordance with the government's Business Appointment Rules, the Committee advises this role with **Public Policy Projects** be subject to the following conditions:

- 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 or any of its Arm's Length Bodies on behalf of Public Policy Projects (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 Public Policy Projects (including clients, parent companies, subsidiaries and partners); and
- for two years from your last day in ministerial office, you should not provide advice to Public Policy Projects (including clients, parent companies, subsidiaries and partners) 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 or any of its Arm's Length Bodies.

8. 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.

9. 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 Ministerial Code/Civil Service Code or otherwise.

10. 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.”*

11. I should be grateful if you would inform us as soon as you take up this work 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 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.

12. 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.

Rt Hon The Lord Pickles

The Rt Hon Chris Skidmore MP

Annex

The role

1. You described PPP as an independent policy institute focusing on delivering public policy ideas. On their website, it states PPP *‘is a policy advisory and development organisation in the health, care and local government sectors’*. It provides services that enable others to gain information on the sector, such as news feeds aggregation locally, regionally and globally, as well as providing a database of relevant knowledge.

2. You stated: *'As Senior Advisor for Public Policy Projects, this new role would involve being involved with the policy output of PPP. I would work with a policy team of analysts and researchers in helping to shape a work stream of reports, seminars, conferences, and events across several policy themes. I would also work with individual chairs of sub-groups within PPP that focus on specific policy agendas, such as social care, life sciences, climate change and energy, infrastructure, to ensure that their own work is on schedule and they are content with the delivery of their own policy agenda. I would help to represent Public Policy Projects at the launch of policy reports and on the media.'*

3. *Public Policy Projects is an independent policy institute that does not involve itself in any lobbying activities. Its primary purpose is to help shape the future policy agenda by proposing and leading on new, independently formulated and innovative policy ideas across the public sector. As Senior Advisor, I would help shape this future work, enabling PPP to build both its capacity and its capabilities as a policy institute. I would not be involved in any commercial work.'*

4. On a further request for information about your role, you confirmed the policy work will:

- have a heavy international focus, looking at sectors;
- include listening to and engaging roundtables of experts, professionals and international audiences; and
- be focused in energy and some areas of healthcare (such as genomics) to produce international policy ideas and strategies.

5. You do not expect your role to involve contact with the government; verified you will not be advising anyone on government decisions and will not be working on areas of education or universities.

Dealings in office

6. You stated you did not have contact with PPP while you were in office. Also, you had no involvement in policy or contractual decisions whilst in office that would have specifically impacted PPP. You further confirmed you did not meet with competitors of PPP or have access to sensitive information about competitors of the organisation.

Department Assessment

7. The Department for Business, Energy, and Industrial Strategy was consulted on this appointment and confirmed the details you provided. It has no concerns about you taking up this role and highlighted you should not be involved with lobbying the government for at least two years from your last day in office.