



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 an Associate for Global Partners Governance (GPG). 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 GPG.
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 that you did not meet with nor make any decisions specific to GPG. Further there is no relationship between GPG and the Welsh government, as such, the Committee considered there was no evidence to suggest you were offered this role as a reward for actions or decisions taken in office.
5. The Committee noted that this proposed role has some overlap with your time in post as you will be providing advice on aspects of governance and parliamentary development. Therefore, there could be a risk you have access to relevant privileged information and knowledge, which could unfairly benefit GPG. However, the Committee considered this risk is low. Your proposed work with GPG is limited to advising the Middle East, Africa, Asia, and Eastern Europe; and the Foreign, Commonwealth and Development Office

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.

(FCDO) confirmed it had no concerns with the appointment. The Committee also took into consideration you had no specific responsibilities overlapping with GPG and 6 months have passed since you had access to information.

6. The Committee also recognised the inherent risks associated with a former minister's network and influence that might be perceived to unfairly assist GPG. However, the Committee noted your role is internationally focussed and does not involve contact with the UK government.

The Committee's advice

7. The Committee noted both the Welsh government's and the FCDO's confirmation they had no concerns with you taking up this appointment. Further you are subject to the conditions below which prevent you from drawing on privileged information that you had access to. As such, whilst GPG will undoubtedly gain from your profile, and your skills and experience in government, the risk you could use sensitive information to unfairly benefit GPG are mitigated.
8. The Committee would also like to draw your attention to paragraph 13 which clearly states if the scope of your role with GPG was to change for example if your advice was to extend to clients beyond the Middle East, Africa, Asia, and Eastern Europe you will need to inform the Committee as it may be necessary for you to make a fresh application.
9. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **Global Partners Governance** 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 or its Arms' Length Bodies on behalf of Global Partners Governance (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 Global Partners Governance (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 Global Partners Governance (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 or its Arms' Length Bodies.

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.

Kirsty Williams CBE FRCN

Annex - Material information

The role

1. You informed the Committee GPG works with elected representatives and officials to deliver programmes of parliamentary development in the Middle East, Africa, Asia, and Eastern Europe.
2. The website states GPG supports politicians, ministers, and civil servants in their efforts to strengthen their institutions. Since 2005, it states GPG has worked in more than 40 countries, helping to manage change in some of the world's most complex and sensitive political environments. The website states it provides:

- Strategic analysis and advice
- Programme design and delivery
- Research and publications
- Online courses and training

3. You said this paid, part-time role will be to join a team of associates who may be asked to contribute to a project. This could involve working with elected representatives in other nations providing training and advice on aspects of governance, parliamentary and participation development. You do not expect your role to involve contact with government.

Dealings in office

4. You told the Committee you did not meet with GPG while in office and there is no known relationship between the Welsh government and GPG. Further, you said you:

- did not have any involvement in any relevant policy development or decisions that would have affected GPG
- no commercial or contractual responsibilities relating to GPG; and
- nor did you meet with competitors of GPG or have access to sensitive information regarding these competitors.

Department Assessment

5. The Welsh government confirmed the information you provided and confirmed you did not have access to information that could provide an unfair advantage. The department confirmed it had no concerns and recommended the standard conditions should be applied.

6. Given the nature of the role, the FCDO also provided their views and confirmed it had no concerns with the appointment.