



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

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)

Website: <http://www.gov.uk/acoba>

Rt Hon Angela Rayner MP  
Deputy Leader, Shadow Chancellor of the Duchy  
of Lancaster and Shadow Secretary of  
State for the Future of Work  
By email

23 February 2022

Dear Angela

Thank you for your letter of 10 February 2022 in respect of the private interests of political appointees to No.10.

**ACOBA's remit**

ACOBA has a defined role - to apply the government's Rules at the most senior levels of government, in relation to outside appointments taken up for two years after leaving government service. Under those Rules ACOBA considers the risks associated with the actions and decisions an individual has made during their time in office, alongside the information and influence they may offer the new employer. The issues raised in your letter primarily relate to potential conflicts of new appointees to No.10 on joining government, rather than leaving it. Managing those interests is a matter for the Cabinet Office.

It might be helpful to note that special advisers are subject to the Special Advisers Code of Conduct and therefore subject to the government's Business Appointment Rules - the most senior special advisers are required to submit applications to ACOBA.

**Management of conflicts**

The management of interests on entry into service, and while in office if necessary, can have a material impact on ACOBA's work once individuals leave service. I have said

previously that the government should demonstrate how it holds individuals to account for their responsibility to act without impropriety. I wrote to the government stressing the importance of transparency in managing conflicts in light of the handling of some outside interests with respect to Greensill. The Cabinet Office later committed to taking steps to ensure processes are robust and transparent. The correspondence is set out on ACOBA's website here:<https://www.gov.uk/government/publications/correspondence-between-the-rt-hon-lord-pickles-and-alex-chisolm-permanent-secretary-and-chief-operating-officer-for-the-civil-service>

I understand that government is also considering its response to Nigel Boardman's report<sup>1</sup> which made recommendations on managing conflicts before, during, and after government service; alongside recommendations from the Committee on Standards in Public Life's 'Upholding Standards in Public Life' report. I was pleased to see many of ACOBA's recommendations for improvements to the system shared in both these reports.

I am keen to see the Nolan principles further embedded into the culture of the Civil Service and for a more rigorous approach to compliance with the rules and standards expected in public life.

In line with ACOBA's policy on transparency, this correspondence will be published on our website.

Best wishes

A handwritten signature in black ink that reads "Sirie Pickles". The signature is written in a cursive, flowing style.

The Rt Hon Lord Pickles

---

1

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1018176/A\\_report\\_by\\_Nigel\\_Boardman\\_into\\_the\\_Development\\_and\\_Use\\_of\\_Supply\\_Chain\\_Finance\\_and\\_associated\\_schemes\\_related\\_to\\_Greensill\\_Capital\\_in\\_Government\\_-\\_Recommendations\\_and\\_Suggestions.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1018176/A_report_by_Nigel_Boardman_into_the_Development_and_Use_of_Supply_Chain_Finance_and_associated_schemes_related_to_Greensill_Capital_in_Government_-_Recommendations_and_Suggestions.pdf)