



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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The Rt Hon John Whittingdale OBE MP
House of Commons
London
SW1A 0AA
By email

11 April 2022

Dear John,

Thank you for your response to my letter as Chair of the Advisory Committee on Business Appointments (ACOBA), dated 23 March. You provided additional context regarding your work for the Betting and Gaming Council and AlphaSights Ltd. This is attached below.

You described your speech for the Betting and Gaming Council as a '*one-off*' engagement. You informed ACOBA you did not draw upon any privileged information available to you from your time in ministerial office.

An application to ACOBA was not required for this one-off speech. As you noted, ACOBA's guidance confirms it does not regard one-off activities such as speeches, broadcasts, or newspaper articles as '*appointments or employment*' under the government's Business Appointment Rules.

You described your work for AlphaSights Ltd as two separate speeches to a small audience on a topic of their choosing, with the opportunity for questions. You noted all participants are required to agree that they will neither ask for, nor offer, any privileged information during these engagements. You confirmed you do not have a long-term arrangement with AlphaSights, and were approached by the company on separate occasions to carry out these two speeches. You said that having considered the information about one-off activities, you believed you did not need to submit an application to ACOBA.

The description of this work in your letter is not consistent with that in the parliamentary Register of Members' Financial Interests¹. The Register described your work for the company as '*advice on the UK economy*' and '*advice on UK consumer issues*'. Having explained to ACOBA these engagements were speeches, I understand the Register is therefore incorrect. You must take the necessary steps to correct the public record and inform the relevant authority.

As set out in ACOBA's guidance, if you enter into a longer term arrangement, including a series of speeches with AlphaSights, advice will be required from ACOBA. As I am sure you understand, ACOBA's guidance on one-off activities does not provide a loophole to avoid seeking advice on advisory work. If you do intend to provide consultancy services or enter into advisory work with AlphaSights or any other organisation, an application to ACOBA would be required.

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

Your ever
Sue

The Rt Hon Lord Pickles

¹ https://publications.parliament.uk/pa/cm/cmregmem/220228/whittingdale_john.htm



RT. HON. JOHN WHITTINGDALE, OBE MP

Member of Parliament for Maldon

Rt Hon Lord Pickles
Office of the Advisory Committee on Business Appointments
Room G/8
1 Horse Guards Road
London SW1A 2HQ

23rd March 2022

Dear Eric,

Thank you for your letter dated 23 March. I am grateful to you for the opportunity to clarify this matter.

You are correct that I undertook three paid engagements and registered these in the Members' Register of Financial Interests. I did not consult ACOBA on these activities as I believe that the Guidance makes clear that I am not required to do so.

I have not accepted any appointment or employment since leaving office. The engagements you refer to were all "one-off" activities which according to Section 13 of the "Guidance on making an application to ACOBA" do not require approval. As you note in your letter, these were:

- An entry dated 14 February 2022 declared that you received a payment from the Betting and Gaming Council for a speech at its Annual General Meeting.

This one-off speech clearly comes under the exemption above and, beyond media interest, I am not clear why you suggest that this is a possible breach of the rules. Nevertheless, for absolute clarity, I can confirm that I did not draw upon any privileged information which I had received in my previous role in Government and instead referred only to academic studies and Gambling Commission analysis, all of which is in the public domain.

- An entry dated 13 December 2021 (registered on 2 December 2021) declared that you received payment from AlphaSights Ltd for providing advice on the UK economy.
- An entry dated 14 February 2022 (registered on 1 February 2022) declared that you received payment from AlphaSights Ltd for providing advice on UK consumer issues.



I do not have any long-term arrangement with AlphaSights Ltd. However, I was approached by them on separate occasions to talk to different clients about different subjects. I understand that Alphasights approach experts in many fields on behalf of clients seeking individuals with expert knowledge who can brief investors or businesses about aspects of the financial economy. The best way to describe it is that it is like a speech to a small audience on a topic of their choosing, with the opportunity for questions. AlphaSights are a well-established and respected bureaux which most commonly acts in industry briefings. Critically, they require all participants to agree that they will neither ask for, nor offer, any privileged information during these engagements.

I have no issue with declaring my outside interests nor approaching ACOBA for advice should it be necessary, as I have done in the past. I agree that it is important that those who have held office are seen to be acting with probity in their activities going forward. However, I carefully considered whether I should ask ACOBA about these activities and believe that the rules regarding one-off engagements clearly state that I did not have to do so. If you believe that I am incorrect then I am of course happy to seek advice about any future engagements of this kind.

Yours ever,

John
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The Rt Hon John Whittingdale OBE MP
House of Commons
London
SW1A 0AA
By email

23 March 2022

Dear John,

I am writing to you in my capacity as Chair of the Advisory Committee on Business Appointments (ACOBA). It has been brought to our attention, through a media enquiry, that you updated your parliamentary register of financial interests² to include paid work:

- An entry dated 13 December 2021 (registered on 2 December 2021) declared that you received payment from AlphaSights Ltd for providing advice on the UK economy.
- An entry dated 14 February 2022 (registered on 1 February 2022) declared that you received payment from AlphaSights Ltd for providing advice on UK consumer issues.
- An entry dated 14 February 2022 declared that you received a payment from the Betting and Gaming Council for a speech at its Annual General Meeting.

You are required to seek advice for any appointments or employment you take up within two years of leaving office under the government's Business Appointments Rules (the Rules)³ - which apply by virtue of the Ministerial Code. ACOBA was not consulted on this work and it is a breach of the Rules to take up work without first seeking and awaiting ACOBA's advice where it is required. You appear to be in breach of the Rules and ACOBA requires an

¹ https://publications.parliament.uk/pa/cm/cmregmem/220228/whittingdale_john.htm

² The Committee does not regard one-off activities such as speeches, broadcasts or newspaper articles as an appointment or employment requiring an application for advice under the Rules.

explanation as to why you failed to seek its advice; and any steps you have taken to ensure the probity in this work, given your previous role as a government minister.

In line with our policy of transparency, we will be publishing our correspondence in due course. I would be grateful for a reply to this letter by Wednesday 30 March. Your correspondence or any failure to respond will be included in our publication.

I would also take this opportunity to remind you to seek advice for any new appointment or employment you plan to take up within two years of leaving office, as required by the government's Rules.

Your ever
Sue

The Rt Hon Lord Pickles