



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Graham Stuart MP, former Parliamentary Under Secretary of State at the Department for International Trade, appointment with Tes Global Limited

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the Government's Business Appointments Rules for former ministers (the Rules) on taking up an appointment with Tes Global Limited (Tes) as a Chair of Tes Global International Advisory Board. 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 Tes.
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.
4. It should also be noted that in addition to the conditions imposed on this appointment under the government's Business Appointment Rules, there are separate rules in place with regard to your role as a member of the House of Commons.

The Committee's consideration

5. As Minister for Investment, you had a meeting with Tes' Chief Education Adviser, Lord Knight, in July 2018. This was with regard to the demand for teacher training overseas. Although you had involvement in the International Education Strategy, you did not make any commercial or policy decisions

specific to Tes. The Committee¹ considered the risk you took action or made decisions in office in expectation of this role is low.

6. The general overlap with your work in education means you may have access to privileged information which could be seen to be of general use to any organisation. 6 months have passed since you left office and last had access to information, and you have an ongoing duty of confidentiality. It is also relevant that you had experience in the education sector, including previously working for Tes, prior to your ministerial role.
7. There is a risk associated with your influence should Tes make improper use of your privileged network gained in office.

The Committee's advice

8. The risks above are limited and the conditions below prevent you from making use of the information and contacts gained in office to the unfair advantage of Tes.
9. The Committee advises, under the government's Business Appointment Rules, that your appointment with **Tes Global Limited** 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 or its arms' length bodies on behalf of Tes Global Limited (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 Tes Global Limited (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office you should not undertake any work with Tes Global Limited (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; and
 - for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you have developed during your time in office and in other governments and organisations

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

for the purpose of securing funding/business for Tes Global Limited (including parent companies, subsidiaries and partners).

10. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. It is your personal responsibility to understand any other rules and regulations you may be subject to in parallel with this Committee's advice.
11. 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.
12. 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.
13. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so and we will publish this letter on our website.
14. Any failure to do so may lead to a false assumption being made about whether you had complied with the Rules.
15. You must 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.
16. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

The Rt Hon Lord Pickles

Annex - Material information

The role

1. You seek to join Tes in a paid, part-time role as a Chair of Tes Global International Advisory Board. You said you would have no contact with government in this role.
2. You said Tes is an international provider of software services to make life easier for schools and teachers. Tes' website says it is a global business partnered with teachers and schools around the world. You said Tes Institute, a part of Tes, is '*...the accredited teacher-training arm of Tes*'. You said the Tes Institute Global Advisory Board was set up in the Autumn 2019 with a group of highly experienced school leaders from a range of countries across the world, managing different curricula, school types and cohorts. You said the aim was to discuss, challenge and advise on improving the standards of teaching and learning in international schools. Tes' website says the Board sits every term to advise on strategic developments in international education, each time focusing on a different range of topics. The website says the Board forms part of Tes' mission to work more closely with school communities in order to support and connect teachers worldwide.
3. You said your role would be to chair three meetings a year of headteachers from international schools across the world. You said the role of the Board's members is to:
 - help steer teacher training and development, content and delivery for international schools
 - advise on the key training and development needs within schools and particular regions
 - challenge thinking on the design, delivery and needs of the teacher training programmes
 - challenge/feedback on Tes' current products and those in development when shared
 - inform Tes of changes and opportunities within international education.
4. You said before becoming a minister, you served on an advisory board for Tes from 2015-2016. You also chaired the Education Select Committee from 2010-2015.

Dealings in office

5. You said you did not have any involvement in any policy development or decisions that would have been specific to Tes, and held no commercial or contractual responsibilities relating to the organisation.

Department Assessment

6. DIT confirmed the details you provided.
7. DIT said you had responsibility for and involvement in trade promotion and trade policy decisions whilst in office. It noted the broader impact of these may have affected Tes. Further, DIT confirmed you were involved in the development of the International Education Strategy, but did not consider there

are any sector specific policy decisions. The department confirmed you made decisions with regard to the education sector broadly, not Tes in particular.

8. DIT said you may have met generally with Tes (and its competitors) at educational events; and you had a meeting with Lord Knight, Chief Education Adviser at Tes, on 18 July 2018. The department said this was with regard to the demand for teacher training overseas, and specifically a contract for overseas pilot training programmes was discussed. DIT said Lord Knight noted a limit in the capability of a contractor at that time. DIT also confirmed this was a standard stakeholder meeting and was not aware of any contracts being awarded as a result.
9. DIT described its relationship with Tes, confirming its education lead meets regularly with the organisation - *'As with any sector team within DIT, the education team client manages the larger organisations within the sector, such as Tes; to keep abreast of developments and help where [it] can'*.
10. DIT said you would have had access to privileged information, some of which may be relevant to Tes. For example, it mentioned meeting briefings (e.g. for meetings with the education industry) and relevant policy. The department is not aware of anything specific that would give Tes an unfair advantage.
11. DIT said it has no concerns about this appointment and recommended the standard conditions.