



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

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BUSINESS APPOINTMENT APPLICATION: Allegra Stratton, former Prime Minister's COP26 spokesperson, Cabinet Office. Appointment with Bloomberg News.

1. Allegra Stratton, formally the Prime Minister's COP26 spokesperson (and previous to that the Prime Minister's Press Secretary) sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown servants (the Rules) on joining Bloomberg News. 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 Crown servant may offer Bloomberg News.
3. The Rules set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants 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. Ms Stratton met with Bloomberg journalists during her time in government as she did many other major media outlets in her role. Ms Stratton was not involved in policy or commercial decisions specific to Bloomberg News. The Committee¹ considered the risk she could be seen to have been offered this role as a reward for decisions made, or actions taken in office, was low.
5. As the former COP26 spokesperson, Ms Stratton would have had access to privileged information, specifically around COP26 which may be of general

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

use to Bloomberg News. There are significant mitigating factors here, most notably, Ms Stratton was not responsible for regulatory or policy decisions. Further, as noted by the Cabinet Office, much of the relevant policy is in the public domain following the COP26 Summit in November 2021; and Ms Stratton is bound by the Official Secrets Act and an ongoing duty of confidentiality.

6. Additionally, the Committee noted Ms Stratton does not propose any contact with government in this role. However given her previous senior and central position in government there is a risk her network and influence might assist Bloomberg News unfairly.

The Committee's advice

7. The Committee did not consider joining a newspaper as a contributing editor raised any particular concerns under the government's Rules, provided it is subject to the conditions below. However, the Committee would remind Ms Stratton it is her responsibility to manage the propriety of the specific pieces of work undertaken with Bloomberg News. In particular, she must be careful not to offer any unfair insight access as a result of her access to information and potential influence in government - which the conditions below seek to mitigate.
8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Bloomberg News** be subject to the following conditions:
 - she should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time in Crown service;
 - for two years from her last day in Crown service, she should not become personally involved in lobbying the UK government or any of its Arm's Length Bodies on behalf of Bloomberg News (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage Bloomberg News (including parent companies, subsidiaries, partners and clients); and
 - for two years from her last day in Crown service, she should not provide advice to Bloomberg News (including parent companies, subsidiaries, partners and clients) 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.
9. The advice and the conditions under the government's Business Appointment Rules relate to her 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

her personal responsibility to understand any other rules and regulations she may be subject to in parallel with this Committee's advice.

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 Ministerial 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. You must inform us as soon as Ms Stratton takes up employment with this organisation(s), or if it is announced that she 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 Ms Stratton had complied with the Rules.
13. Please also inform us if Ms Stratton proposes to extend or otherwise change the nature of her role as, depending on the circumstances, it may be necessary for her to make a fresh application.
14. Once the appointment(s) has been publicly announced or taken up, we will publish this letter on the Committee's website.

Yours Sincerely,

Isabella Wynn
Committee Secretariat

Annex - Material information

The role

1. Ms Stratton said Bloomberg is a journalism organisation. The website states Bloomberg delivers business and markets news, data, analysis, and video to the world.

2. Ms Stratton said she would join as a Contributing Editor. To begin with her responsibilities will include writing a daily newsletter to launch their new UK focused-operation. Ms Stratton will do this every day for the first few months before reducing this to 3 days a week in the Autumn. At some point she said she will also write a weekly column for Bloomberg. She informed the Committee the content will be around UK and global policy and politics – much like the journalism she did before she entered government – with a particular interest in climate change and the environment.
3. She also informed the Committee her role will not involve contact with government.

Dealings in office

4. Ms Stratton said during time in government she had normal contact with journalists and dealt with Bloomberg journalists including their political and environmental specialists. However she didn't have any more dealings with them than any other lobby journalists or specialist journalists. Ms Stratton said as her job was to deal with members of the press but none of this would have been in a commercial sense or related to policy governing how they are run. Instead it would have been fielding queries and helping them understand government policy. She said she was not involved in the shaping of departmental policy that affects media and or journalism, nor did she award grants or contracts that would affect it.
5. She confirmed she did not have access to information that could provide an unfair advantage.

Department Assessment

6. The Cabinet Office confirmed the details Ms Stratton provided in her application.
7. The Cabinet Office said Ms Stratton was in a very senior role at COP26 and No.10, and for this reason she had access to a wide range of high-level policy and departmental information across all government business. However, COP26 has now passed and the policies implemented, so it is unlikely her former role would be of use to Bloomberg News. In addition, a year has elapsed since she was the PM's Press Secretary, and over 5 months have passed since she resigned her most recent crown service role. The Cabinet Office considered this would further reduce the currency of information Ms Stratton was party to.
8. The Cabinet Office stated it would be inappropriate for Ms Stratton to use her internal contacts developed from her time in No.10 / HMT. Otherwise, the department had no concerns with regards to this application and recommended the standard conditions and a three month waiting period which has now passed.