



**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>

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**BUSINESS APPOINTMENT APPLICATION: Baroness Sugg CBE, former Parliamentary Under Secretary of State (Minister for the Overseas Territories and Sustainable Development) at the Foreign, Commonwealth & Development Office, appointment with the UK Alliance to End Malnutrition and Hunger**

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 the UK Alliance to End Malnutrition and Hunger (the Alliance) as a Co-Chair. The material information taken into consideration by the Committee is set out in the annex below.
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 the Alliance.
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 Lords.

The Committee's consideration

5. The Committee<sup>1</sup> noted the Alliance is a newly formed organisation, and the Foreign, Commonwealth & Development Office (FCDO) confirmed it has no

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

relationship with it. The Committee considered the risk of this work being offered as a reward for decisions made, or actions taken in office, as low.

6. This appointment has no direct overlap with your time in office, though there is a crossover with the sustainable development goals which include seeking to end poverty and hunger and improve nutrition and food security. The risks associated with your access to information in office are low given you have been out of office for 16 months and have an ongoing duty of confidentiality.
7. There is a risk associated with your influence should the Alliance make improper use of your privileged network gained as a result of your time 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 the Alliance.
9. The Committee advises, under the government's Business Appointment Rules, that your appointment with the **UK Alliance to End Malnutrition and Hunger** 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 the UK Alliance to End Malnutrition and Hunger (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 the UK Alliance to End Malnutrition and Hunger (including parent companies, subsidiaries, partners and clients);
  - for two years from your last day in ministerial office you should not undertake any work with the UK Alliance to End Malnutrition and Hunger (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 for the purpose of securing funding/business for the UK Alliance to End Malnutrition and Hunger (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 the UK Alliance to End Malnutrition and Hunger in a paid, part-time role as a Co-Chair.
2. You said the Alliance is a '*New organisation set up to bring together UK stakeholders working in malnutrition to encourage support for action in this*

*field*'. You said the Alliance will work with non-governmental organisations, academia, businesses and financial organisations to '*...highlight the importance of the UK's work to end malnutrition and hunger*'.

3. You said the Alliance is currently employing a CEO and small secretariat, and will be supported by the Eleanor Crook Foundation (ECF) - a '*...growing U.S. philanthropy fighting to end global malnutrition*'.
4. You said the Alliance's funding is still being finalised, but will include primary support from ECF.

#### Dealings in office

5. You advised the Committee you did not meet with the Alliance, which is a newly established organisation. Further, you said you did not have any involvement in any policy development or decisions that would have been specific to the Alliance, and held no commercial or contractual responsibilities relating to the organisation.

#### Department Assessment

6. FCDO confirmed the details you provided.
7. FCDO said it has no concerns about this appointment and recommended the standard conditions.