

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Baroness (Natalie) Evans of Bowes Park, former Leader of the House of Lords. Paid appointment with Salad Projects Ltd.

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 an appointment you wish to take up with Salad Projects Ltd as a Joint Chair of the Oversight Body. 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 your time in office, alongside the information and influence a former minister may offer Salad Projects Ltd.
3. The Committee has advised that a number of conditions be imposed to mitigate the potential risks to the government associated with this appointment under the Rules; this is not an endorsement of this appointment in any other respect.
4. 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.

The Committee's consideration of the risk presented

5. The Committee¹ noted you did not meet with Salad Projects during your time as a

¹ 1 This application for advice was considered by Jonathan Baume; Isabel Doverly; Andrew Cumpsty; Sarah de Gay; Mike Weir; and Lord Larry Whitty. Richard Thomas and Dr Susan Liataud were unavailable. This letter contains the Committee's advice, arrived at without my input and which I am sending in my capacity as Chair of the Committee.

minister. The Cabinet Office also confirmed you made no decisions specific to Salad Projects Ltd whilst in office. Therefore, the Committee considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.

6. As a former minister, there are inherent risks associated with your access to privileged information and knowledge. However, the Cabinet Office confirmed there was no direct overlap with your time in office and it did not have any concerns regarding your access to information.
7. You wanted to let the Committee know that you may speak in the House of Lords if the company or its work was relevant to a discussion. You confirmed your role would not involve any lobbying or contact with the government on behalf of Salad projects. As a Member of the House of Lords your activity in the House is transparent and governed by the House of Lords Code of Conduct. The Committee considered this would therefore be in keeping with the lobbying ban that applies to all former ministers.

The Committee's advice

8. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. The standard conditions below will sufficiently mitigate the risks in this case. These seek to prevent you from drawing on your privileged information, contacts and influence gained in ministerial office to the unfair advantage of Salad Projects Ltd.
9. Taking these factors into account, in accordance with the government's Business Appointment Rules, the Committee's advice is this appointment with **Salad Projects Ltd** 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 government or its arm's length bodies on behalf of Salad Projects Ltd (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 Salad Projects Ltd (including parent companies, subsidiaries, partners and clients); and
 - for two years from your last day in ministerial office you should not undertake any work with Salad Projects Ltd (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 arm's length bodies.
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 this role, or if it is announced that you will do so. You must also 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.
14. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee’s website, and where appropriate, refer to it in the relevant annual report.

The Rt Hon Lord Pickles

Annex - Material Information

The role

1. Its description on Companies House said it performs ‘*credit granting by non-deposit taking finance houses and other specialist consumer credit grantors*’. The activities classified under this definition include, but not limited to, money lending, loan company (other than bank sector), finance house activities (non-deposit taking) and consumer credit granting company (other than banks and building societies). Salad Projects Limited is the owner of both **Salad Money** and **Salad Money Mind**:
 - Salad Money is a lending company exclusively for NHS and public sector workers
 - Salad Money Mind is a free online financial support tool exclusively for use by NHS and public sector workers
2. You said in your paid, part-time capacity as Joint Chair of the Oversight Body that your responsibilities alongside other members of the Oversight Body would be ‘*for providing oversight of Salad and its business practices to ensure that consumers are properly protected. I would also play a part in highlighting with the public, media and appropriate bodies the data that Salad collates to inform public debate in a transparent way*’.
3. You said you would not have contact with government but you will be speaking publicly - you said you would bring attention to the data Salad Projects Limited holds, and about what the organisation does such as writing blogs and op-eds and possibly speaking in the House of Lords. You also said this role will not involve any promotion of Salad Projects Limited or its products or any lobbying of government on its behalf.

Dealings in office

4. You advised the Committee that you did not meet with Salad Projects Ltd whilst in office. You said you did not have any involvement in policy, regulatory or commercial decisions that would have been specific to the company.

Departmental assessment

5. Cabinet Office confirmed the details you provided and had no concerns about the appointment. It recommended the standard conditions.