



Lord True CBE
Minister of State
Cabinet Office 70 Whitehall London SW1A 2AS

The Rt Hon Lord Pickles
Chair, Advisory Committee on Business
Appointments
1 Horse Guards Road
London
SW1A 2HQ

Our reference: MC2022/01189

29 March 2022

Dear Eric,

Thank you for your letter of 24 January to the Chancellor of the Duchy of Lancaster, relating to your correspondence with Mr Steve Brine MP. I have been asked to reply as the Minister with policy responsibility for the Business Appointment Rules.

The Cabinet Office agrees with the Committee's assessment that Mr Brine has not adhered to the Business Appointment Rules due to his failure to seek the Committee's advice in advance of his engagement as a Strategic Adviser at Sigma Pharmaceuticals. From the correspondence you enclosed, we understand that Mr Brine has since apologised for the delay in submitting his application. Whilst Mr Brine was approaching the end of his time bound by the Business Appointment Rules, it is vital that all individuals who have held Ministerial positions abide by the requirement to seek advice about any appointments or employment they wish to take up within two years of leaving office, and we will continue to ensure that former Ministers are made aware of this obligation.

I have also considered Mr Brine's contact with the Minister for Vaccine Deployment on behalf of Sigma. Noting your assessment that Mr Brine thought his contact with this Minister was appropriate, and that his actions were not an attempt to get direct financial benefit for the company, we feel that the perception of risk of undue influence is low. However, the activity raised the reasonable concern that Sigma Pharmaceuticals' access to the Government was granted on the basis of Mr Brine's position as a former Parliamentary Under Secretary of the Department of Health and Social Care. It is vital that such perceptions are avoided in order to safeguard the integrity of the Government. I have informed Mr Brine of the Government's decision by direct letter, outlining the importance of adhering to the Business Appointment Rules.

As you are aware, the Cabinet Office is working with your Committee to improve the operation and efficacy of the Business Appointment Rules. This will include assessing the range of sanctions and also how business appointment conditions should be proportionate to risk. We welcome the steps the Committee will take in their future correspondence to clarify former Ministers' responsibilities under other rules and regulations, in addition to the Committee's advice on Business Appointments. We will endeavour to further clarify the obligations of former Ministers in our improvement of the Rules.

I would like to thank the Committee for your ongoing work on these matters.

Yours sincerely

A handwritten signature in black ink that reads "Nicholas True". The signature is written in a cursive, slightly slanted style.

Lord True CBE