

*From the Chair*



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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May 2023

**BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: The Rt Hon Sir Alok Sharma KCMG MP, former President for COP26 and Secretary of State for Business, Energy and Industrial Strategy. Unpaid appointment with the Rockefeller Foundation.**

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 unpaid role you want to take up with The Rockefeller Foundation (the Foundation).
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during your time in office, alongside the information and influence you may offer the Foundation. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
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 risks presented

5. When considering this application, the Committee<sup>1</sup> took into account this appointment is unpaid<sup>2</sup>. Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of the Government by considering the real and perceived risks associated with former ministers joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions or take action in office to in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. As President for COP26, this proposed role overlaps with your time in office. The Cabinet Office and the Department for Energy, Security and Net Zero (DESNZ - formerly part of the Department for Business, Energy and Industrial Strategy) confirmed you had no access to sensitive information and information related to COP 26 is now in the public domain. The unpaid nature of this appointment limits the real and perceived risk of you making improper use of information you had access to while in office for your personal benefit.
7. There may be circumstances where you may be in contact with government officials as part of your role. Where contact is instigated by government departments/officials it would not be contrary to the lobbying ban - which is imposed on all former senior officials for 2 years on leaving office.

### The Committee's advice

8. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. Whilst there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below, preventing you from drawing on your privileged information and using your contacts to the unfair advantage of your new employer, will sufficiently mitigate in this case.
9. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **The Rockefeller Foundation** 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;

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

<sup>2</sup>By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arms' length bodies on behalf of The Rockefeller Foundation (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 Rockefeller Foundation (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 The Rockefeller Foundation (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.
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/House of Lords Commissioners for Standards. It is an individual's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.
  11. 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. Any failure to do so may lead to a false assumption being made about whether you had complied with the Rules.
  12. 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.
  13. 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. In your role as Climate and Finance Fellow, you will work as part of The Rockefeller Foundation's Global Economic Recovery programme. You stated you will work to help build an international political consensus, through engagement with key governments, multilateral agencies and NGO's on:
  - international financial reform, particularly of the the multilateral development banks, to ultimately get more public and private finance flowing to a range of sustainable development needs including climate finance through existing and new instruments; and
  - treatment of existing debt in low and middle income countries as to improve their chances of sustainable development.
2. You said the role is unpaid & you will receive no fees. However, you will have access to staffing support from The Rockefeller Foundation to assist your work, to which the Foundation will cover the cost of your flights, hotels and out-of-pocket expenses incurred during international travel you may undertake.
3. You said the Foundation is a philanthropic organisation/fund with the mission to promote the wellbeing of humanity around the world. Its website states it is an American private foundation and philanthropic medical research and arts funding organisation based in New York City, New York, USA.
4. You said the Foundation has a Global Economic Recovery programme focused on increasing the quality and quantity of financing to advance global development and climate action goals, including the Foundation's own programmatic goals.
5. You stated that whilst the bulk of his engagement will be with foreign governments, you may need to speak to UK Ministers and officials (particularly in the Foreign, Commonwealth and Development Office and His Majesty's Treasury).
6. You also said after completing your term as COP26 President, you were directly approached by the Foundation President if you were interested in working with them on international finance reform agenda.

### Dealings in office

7. You advised the Committee that you met with the Foundation during your time as COP26 President. The nature of these meetings was primarily around key international events and you discussed initiatives with the Foundation when it was working with other philanthropies (such as the Global Energy Alliance for People and Planet initiative). However, you stated you were not involved in any impact on UK policy or regulatory decisions relevant to the Foundation.

### Departmental Assessment

8. The Cabinet Office and the DESNZ provided their views on this application.

9. Both departments confirmed you were not involved in any decisions relevant to the Foundation.
10. The Cabinet Office confirmed you had contact with representatives of the Foundation during your time as COP President, including speaking at two events hosted by the Foundation. The department stated you had other contact with the Foundation during multilateral events.

The Cabinet Office said the nature of the Foundation means there are no strict competitors - and many peer organisations collaborate on joint initiatives in the climate space. The department said you were in contact with a number of other similar philanthropic organisations during your time as COP President.

11. The Cabinet Office and DESNZ had no concerns with the appointment.
12. DESNZ recommended the standard conditions
13. The Cabinet Office recommended you should not use any privileged information you may hold from your time in government to influence your engagement with governments, multilateral agencies or NGOs & any communications with these bodies should be conducted solely through official channels.