



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Robert Buckland QC MP, former Secretary of State for Wales and Lord Chancellor and Secretary of State for Justice. Paid appointment with Chambers UK.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former ministers (the Rules) seeking advice on taking up a paid role as a panel member with Chambers UK. The material information taken into consideration by the Committee is set out in the below 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 minister may offer Chambers UK.
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.

The Committee's consideration of the risk presented

4. The Committee¹ took into consideration that you previously received advice on this same role², which you are taking up again after having left office more recently in October 2022. Having consulted your most recent former department

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

² The Committee's advice is online here <https://www.gov.uk/government/publications/buckland-robert-lord-chancellor-and-secretary-of-state-for-justice-ministry-of-justice-acoba-advice>

there remains a low risk that this role was offered as a reward for decisions made in office: you did not have any official contact with Chambers UK whilst in office and you did not make any policy or contractual decisions that would have specifically affected Chambers UK.

5. The Committee noted that given your most recent role as the Secretary of State for Wales there is an inherent risk you could be perceived as having access to relevant privileged information and knowledge, which could unfairly benefit Chambers UK. This risk is limited given you left your previous role in office in September 2021, and spent a relevantly short time at the Welsh Office as Secretary of State for Wales between July 2022 to October 2022. The Welsh Office confirmed there is no privileged information you had access to that it is aware of that could offer Chambers an unfair advantage. This limits the real and perceived risk of you making improper use of information you had access to while in office for your personal benefit and you have an ongoing duty of confidentiality.

6. The Committee noted there are risks associated with your contacts and influence within government, this is especially relevant as the panel looks to present its recommendations to government. It is relevant to the Committee's consideration of the risk that you have confirmed you will not have any contact with government in this role, in keeping with the lobbying ban that applies to all former ministers.

The Committee's advice

7. The Committee considered there was nothing improper in your general involvement with Chambers in this policy space where the standard conditions are applied as below. These conditions make it clear you should not use privileged information, influence or contacts to the unfair advantage of your new employer.

8. As the former Secretary of State for Wales, a member of Cabinet, you are also subject to the standard three month waiting period before taking this role up.

9. In accordance with the government's Business Appointment Rules, the Committee advises this role with **Chambers UK** be subject to the following conditions:

- a waiting period of three months from your last day in ministerial office;
- that you should not draw on (disclose or use for the benefit of yourself or the organisations to which this advice refers) any privileged information available to you from your time in office;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the government or any of its Arm's Length

Bodies on behalf of Chambers UK (including clients, parent companies, subsidiaries and partners). Nor should you make use, directly or indirectly, of your government and/or ministerial contacts to influence policy, secure funding/business or otherwise unfairly benefit Chambers UK (including clients, parent companies, subsidiaries and partners); and

- for two years from your last day in ministerial office, you should not provide advice to Chambers UK (including clients, parent companies, subsidiaries and partners) 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.

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 an applicant's 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 Ministerial Code/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.*"

13. I should be grateful if you would inform us as soon as you take up this work or if it is announced that you 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 you had complied with the Ministerial Code. Similarly, I should be grateful if you would inform us if you propose to extend or otherwise change your role with the organisation as depending on the circumstances, it might be necessary for you to seek fresh advice.

14. Once this 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

The role

1. You wish to take up a paid part time role as a panel Member with Chambers UK. The website states Chamber UK provides regional broadcasting events aimed at connecting communities across the UK. From its social media and events page it appears that it sets up a number of commissions or conversations with experts and officials to answer questions posed by the public and help government.
2. You said Chambers UK is forming a commission on government's plan on Levelling Up which will gather evidence, conduct research and hold inquiry sessions with the aim of presenting recommendations to government as to how to ensure the delivery of levelling up plans at a local level.
3. You informed the Committee you do not propose to contact ministers or officials but will instead be helping to gather information and evidence from local government and other agencies in order to present a paper containing suggestions as to how the Levelling Up policy can be implemented on the ground. This is an outward-facing exercise that does not involve engagement between him and the government.
4. You are returning to the same role you held with SMF before rejoining the government in July 2022 for just over three months.

Dealings in office

5. You stated you did not have contact with Chambers UK while you were in office. Also, you had no involvement in policy or contractual decisions whilst in office that would have specifically impacted Chambers UK. You further confirmed you did not meet with competitors of Chambers UK or have access to sensitive information about competitors of Chambers UK.
6. You informed the Committee during your time at the Welsh Office you met with the Chair of the Welsh Local Government Association in a formal meeting as SoS Wales and informally met the leaders of Gwynedd, Ceredigion, Cardiff and Merthyr Councils at various events during his time in office. The Shared Prosperity Fund (part of governments Levelling Up agenda) was a topic of discussion.

However you have confirmed you will not have any contact with these individuals or groups in your capacity as Chair of The Commission.

Department Assessment

7. The Welsh Office was consulted on this appointment and confirmed the details you provided - including that you had no access to privileged information that could be considered to offer an unfair advantage to Chambers. It has no concerns about you taking up this role.