

*From the Chair*



**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>

June 2023

**BUSINESS APPOINTMENT APPLICATION: The Rt Hon Baroness Natalie Evans of Bowes Park, former Leader of the House of Lords. Paid appointment with Charter School Capital UN Limited (UK).**

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 Charter School Capital UN Limited (UK) (Charter Schools UK) as Chair of the Advisory Board. 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 Charter Schools UK.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to 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 risk presented

5. You did not meet with Charter Schools UK during your time as a minister; nor did you make any decisions specific to the company whilst in office. Therefore, the Committee<sup>1</sup> 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 is no direct overlap with your time in office and it did not have any concerns regarding your access to information.
7. As with any application, your contacts and influence across government could offer your employer an unfair advantage. You confirmed that your proposed role would not involve any contact with government, lobbying or otherwise and that you will maintain full compliance with the House of Lords Code of Conduct.

### 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 prevent you from drawing on your privileged information, contacts and influence gained in ministerial office to the unfair advantage of Charter Schools UK.
9. Taking these factors into account, in accordance with the government's Business Appointment Rules, the Committee's advice is this appointment with **Charter Schools UK** 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 Charter Schools UK (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 Charter Schools UK (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 Charter Schools UK (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

---

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

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. You said that Charter Schools UK is an '*education-focused real estate & financial services company*'. It is a newly established subsidiary of parent company Charter School Capital Inc (USA) which helps charter schools: getting them finances, resources, and know-how 'to create thriving schools'. Companies House states that this organisation was established in October of 2022.
2. You said in your paid, part-time capacity as Chair of the UK Advisory Board that your responsibilities will include:
  - a. providing senior counsel to the Charter School Capital UN Limited's UK Directors
  - b. advising on the strategic risks and opportunities at a national and local level as they enter the UK education market
  - c. acting as an Ambassador (along with other members of the advisory board) on behalf of Charter Schools UK with key stakeholders within the sector - such as headteachers.
3. You said this will not involve any advocacy on behalf of Charter Schools UK towards UK government ministers and departmental officials.

### Dealings in office

4. You advised the Committee that you did not meet with Charter Schools UK 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. The Cabinet Office confirmed the details you provided and had no concerns about the appointment. It recommended the standard conditions.