



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Lord Frost of Allenton CMG, former Minister of State at the Cabinet Office. Paid appointment to the Centre for Policy Studies.

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 the Centre for Policy Studies as consultant. 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. 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 Centre for Policy Studies. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's¹ 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.

¹ This application for advice was considered by: Sarah de Gay; The Rt Hon Lord Pickles; Mike Weir; and The Baroness Jones of Whitchurch. Andrew Cumpsty, Jonathan Baume, Richard Thomas, and Isabel Doverty were unavailable.

The Committee's consideration of the risks presented

5. You informed the Committee that you had routine contact with the Centre for Policy Studies as one of several policy-based think tanks as part of your previous duties as a minister. As such, the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
6. As the former Minister of State in the Cabinet Office, you had access to a wide range of privileged information. The 20 months which have passed since you were in office provides a significant gap to any information you may have had access to. This limits the real and perceived risk the information is sufficiently up to date to offer an unfair advantage.
7. As a former minister, you will have gained contacts across the UK government and private companies. There is a risk that your network and influence gained in office might be used to assist the organisation unfairly, which would raise risks under the Rules. The Committee noted that your proposed role will not involve any contact or dealings with government, which is in keeping with the Rules.

The Committee's advice

8. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Rules. The conditions below make it clear you cannot make use of your access to privileged information, contacts or influence gained from your time in ministerial office to the unfair benefit of the Centre for Policy Studies. These conditions appropriately mitigate the risks identified above.
9. The Committee advises, under the government's Business Appointment Rules, that your role with **the Centre for Policy Studies** should 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 the Centre for Policy Studies (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial office to

influence policy, secure business/funding or otherwise unfairly advantage the Centre for Policy Studies (including parent companies, subsidiaries, partners and clients); and

- for two years from your last day in ministerial office, you should not provide advice to the Centre for Policy Studies (including parent companies, subsidiaries, partners and clients) 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.
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. You said that the Centre for Policy Studies is a centre-right think tank. Its mission is to develop a new generation of conservative thinking, built around promoting enterprise ownership and prosperity.
2. As a consultant, you said you will provide advisory services to the think tank, and support and work on projects. You said that your role will not involve any contact or dealings with government.

Dealings in office

3. You said that you had informal dealings from time to time with the Centre for Policy Studies as a minister, as with other think tanks. You spoke at a Centre for Policy studies conference on 22 November 2021.

Departmental Assessment

4. The Cabinet Office confirmed the details you provided.
5. The Cabinet Office confirmed that it does not have a contractual relationship with the Centre for Policy Studies though it is a stakeholder as with other similar think tanks.
6. The Cabinet Office said that you made or contributed to making significant decisions relating to trade policy and strategy. It said you did not have access to information that would provide an unfair advantage to the Centre for Policy Studies and had no concerns with the appointment.
7. The Cabinet Office recommended standard conditions.