



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

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**BUSINESS APPOINTMENT APPLICATION: Allegra Stratton, former Prime Minister's COP26 spokesperson at the Cabinet Office. Paid commission with Saxa Vord under your independent consultancy.**

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown Servants (the Rules) on taking up a work with Saxa Vord under your independent consultancy.
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 company. 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 Rules<sup>1</sup> set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

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<sup>1</sup> Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code.

### The Committee's consideration of the risk presented

5. The the Committee<sup>2</sup> considered this commission to be consistent with the description of your consultancy, Zeroism, which you described as focused on advising companies how they can reach net zero.
6. You were not involved in any decisions specific to Saxa Vord whilst you were in office, nor is there any direct relationship between the company and your former department. Therefore, there is limited risk that this commission can reasonably be perceived as a reward for decisions made or actions taken in office.
7. There is no direct overlap with your former role in office and the space industry in which Saxa Vord operates. As the former Prime Minister's COP26 Spokesperson, you would have had access to privileged information and knowledge about international climate change. The risk associated with this access to information is limited given:
  - 18 months has passed since you left office and had access to information
  - both COP 26 and COP 27 events have now passed and information about decisions made and next steps are in the public domain
  - there have been significant changes in the administration since you left office, with two new Prime Ministers and a changing Cabinet - with associated changes in policy direction.

### The Committee's advice

8. The Committee did not consider this work raises any particular proprietary concerns under the government's Rules, particularly in light of the time that has passed since you were in office and the information that is now in the public domain.
9. The Committee considered the conditions attached to your consultancy which seek to prevent the improper use of information and contacts to the unfair advantage of Saxa Vord would appropriately mitigate these risks.
10. In accordance with the government's Business Appointment Rules, the Committee advises this work with **Saxa Vord** should be subject to the same conditions applied to your independent consultancy. (Noting the six month waiting period that was imposed has now passed):
  - a six month wait from your last day in Crown service;
  - 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 Crown service;

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<sup>2</sup> This application for advice was considered by Isabel Doverty; Jonathan Baume; The Rt Hon Lord Pickles; Richard Thomas; Lord Whitty; Sarah de Gay; and Mike Weir. Andrew Cumpsty was absent.

- for two years from your last day in Crown service, you should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of those she advises under your independent consultancy (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 contacts to influence policy, secure business/funding or otherwise unfairly advantage those you advise under your independent consultancy (including parent companies, subsidiaries, partners and clients);
  - for two years from your last day in Crown service, you should not provide advice to on behalf of those you advise under your independent consultancy (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 or any of its arm's length bodies; and
  - for two years from your last day in Crown service, you should not become personally involved in lobbying contacts you developed during your time in office in external organisations (including other governments) for the purpose of securing business for your consultancy or its clients (including parent companies, subsidiaries and partners).
  - for two years from your last day in Crown service, before accepting any commissions for your independent consultancy and or/before extending or otherwise changing the nature of the commissions, you should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.
  - The advice and the conditions under the government's Business Appointment Rules relate to an applicant's 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 they 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*'.

13. You must inform us as soon as you take up this work or it is announced. 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 to make a fresh application.
14. Once this appointment has been publicly announced or set up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

Yours Sincerely

**Xante Chalwell**  
**Committee Secretariat**

## **Annex - Material information**

### The role

1. You said that you have been asked to set up a new centre at Saxa Vord Spaceport, called '*The Space Environmental & Climate Control Centre*' (SECCC).
2. The SECCC will be responsible for promoting innovation in the satellite industry on sustainability; connecting the Saxa Vord spaceport into domestic and international debates about science, innovation and climate; and driving Saxa Vord's work in educating school children across the UK about the space sector.
3. You said that the SECCC will act as a hub for satellite practitioners, scientists and sustainability experts to come together and pioneer new ways of doing things and that you through the SECCC will seek to make a contribution to that effort.

### Dealings in office

4. You advised the Committee you did not make any policy, commercial, or regulatory decisions specific to Saxa Vord, nor did you meet with them whilst in office. You also told the Committee that you met with the CEO of Saxa Vord, Frank Strang, when you both attended the Braemar summit in the Cairngorms in September 2021, in a personal capacity.

### Department Assessment

5. The Cabinet Office confirmed the details you provided, including:

- you did not make any decisions specific to Saxa Vord
- there is no direct department relationship with Saxa Vord, although company does have relationships with other government agencies and departments:
  - The United Kingdom Space Agency (UKSA) is involved in the Lockheed Martin Pathfinder programme which has agreed to move its operations to Unst, where Saxa Vord is located. The Programme forms a major component of the UKSA delivery plan for 2022-25.
  - Saxa Vord received secondary funding from government via USKA's award of funding to Lockheed Martin. This includes £13.5m to establish launch operations at Saxa Vord Spaceport in Shetland and £10m for the research and development, build and flight demonstration of an Orbital Manoeuvring Vehicle . Lockheed Martin is currently aiming to launch from Saxa Vord Spaceport in Autumn 2022.
  - Saxa Vord is likely in contact with various other government departments and agencies such as the Scottish Government, the Civil Aviation Authority (CAA) due to their regulatory remit. The CAA in particular, is currently considering activity licences and approving potential operators from the site, and are overseeing the recent environmental consultation in relation to Saxa Vord's space operations.
- The value of any information you had access to or knowledge of regarding COP26 (and 27) is degraded because it is now in the public domain.

6. The Cabinet Office recommended standard conditions.