



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Nigel Adams, former Minister Without Portfolio. Paid commission with CloudClevr Holdings Limited under his independent consultancy.

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 taking up a role with CloudClevr Holdings Limited (CloudClevr) under your independent consultancy.
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 you made during your time in office, alongside the information and influence you may offer CloudClevr. 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. The Committee¹ considered this commission to be consistent with the description of your consultancy - providing *'advice and broad consulting services to companies and organisations in the UK and overseas focused but not limited to, the telecoms/ICT sector'*.
6. The Committee noted there is no relationship between CloudClevr and government and you did not meet with, nor were you involved in any decisions specific to CloudClevr whilst you were in office. Therefore, the Committee considered there is limited risk that this commission can reasonably be perceived as a reward for decisions made in office.
7. Given your role in office there is a risk you could have access to general information that could provide an unfair advantage to any organisation but there is no specific overlap with your responsibilities in office and this work. The limited risks associated with your access to information are also limited by the amount of time that has passed since you left ministerial office and the changes in administration, reducing its currency.
8. Given your roles as minister, there are also inherent risks that you could offer CloudClevr unfair access and influence to government. The Committee noted your role will not involve contact with government.

The Committee's advice

9. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Rules. There are inherent risks associated with your access to sensitive information and contacts which the standard conditions below appropriately mitigate. In particular, they prevent you from drawing on your privileged information and using your contacts and influence within government to the unfair advantage of CloudClevr.
10. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this commission with **CloudClevr Holdings Limited**, should be subject to the same conditions applied to your independent consultancy:
 - 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;

¹ This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Sarah de Gay; The Rt Hon Baroness Jones of Whitchurch; The Rt Hon Lord Eric Pickles; and Mike Weir.

- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of ClouldClevr Holdings Limited (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 ClouldClevr Holdings Limited (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to on behalf of ClouldClevr Holdings Limited (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;
- for two years from your last day in ministerial office, before accepting any commissions for your independent consultancy and or/before extending or otherwise changing the nature of your 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.

11. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests². 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.

12. 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.

² All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers

13. 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.”
14. You must inform us as soon as your commission is live or is announced. You must also inform us if you propose to extend or otherwise change the nature of your consultancy as, depending on the circumstances, it may be necessary for you to make a fresh application.
15. 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. According to its website, ClouldClevr is a telecommunication company delivering cloud, communications, and IT services.
2. You said you will be providing strategic advice to CloudClevr. You confirmed this commission will not involve any contact and dealings with government.
3. You stated that prior to your ministerial roles, you worked in the telecoms sector for over 25 years. You said the offer of employment came about following the acquisition of a telecoms business of which you were a director and shareholder of up to 2018. You received an offer to be a consultant in June 2023.

Dealings in office

4. You advised the Committee that you did not meet with, nor involved in decisions or have access to sensitive information specific to CloudClevr.

Departmental Assessment

5. The Cabinet Office noted you gave a speech at a lunch reception on technology media and the creative industries, attended by Vodafone; Samsung and Meta. In June 2022, you met with Cyient Software to learn more about UK-India tech collaboration.
6. The Cabinet Office confirmed you did not meet with, nor did you make any decisions or have access to sensitive information specific to ClouldClevr. The department also confirmed it does not have a relationship with the company.
7. The Cabinet Office did not have concerns with the commission and recommended the standard conditions.

