



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

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**BUSINESS APPOINTMENT APPLICATION: Lord Syed Kamall, former Parliamentary Under Secretary of State at the Department for Digital, Culture, Media and Sport (DCMS) & previously the Parliamentary Under Secretary of State for Technology, Innovation and Life Sciences at the Department of Health and Social Care (DHSC). Unpaid appointment with the Islam & Liberty Network**

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 unpaid role you want to take up as Member of the Advisory Board with the Islam & Liberty Network (ILN).
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 ILN. 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

5. When considering this application, the Committee<sup>1</sup> took into account this appointment as a Member of the Advisory Board of Islam and Liberty Network Foundation<sup>2</sup> is unpaid. Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of the government by considering the real and perceived risks associated with former ministers joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions or take action in office to in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. Your former departments<sup>3</sup> confirmed their view of the risks in the case is low and there is no known overlap with your ministerial roles. As above, the unpaid nature of this appointment limits the real and perceived risk associated with improper use of information and contacts gained from your time in ministerial office for personal benefit.

#### The Committee's advice

7. The Committee did not consider that this appointment raises any particular propriety concerns under the government's Business Appointment Rules. Whilst there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below, preventing you from drawing on your privileged information and using your contacts to the unfair advantage of your new employer, will sufficiently mitigate in this case.
8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **Islam & Liberty Network** 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;

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<sup>1</sup> This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; Sarah de Gay; The Rt Hon Baroness Jones of Whitchurch; Dawid Konotey-Ahulu CBE; The Rt Hon Lord Eric Pickles; Michael Prescott; and Mike Weir.

<sup>2</sup>By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

<sup>3</sup> Following the recent Machinery of Government Changes, your former role as Parliamentary Under Secretary of State at the Department for Culture, Media and Sport now sits with the Department for Science, Innovation and Technology (DSIT).

- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arms' length bodies on behalf of the Islam & Liberty Network (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 the Islam & Liberty Network (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 the Islam & Liberty Network (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 arms' length bodies.
9. 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' Interests<sup>4</sup>. You are reminded that as a Member of the House of Lords you are prevented from any paid lobbying under the House of Lords Code of Conduct. 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.
10. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so and we will publish this letter on our website.
11. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

**The Rt Hon Lord Pickles**

## **Annex - Material information**

### The role

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<sup>4</sup> All Peers and Members of Parliament are prevented from paid lobbying under the 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

1. The Islam & Liberty Network's (ILN) website states that its mission is to advance the understanding of religious, political, and economic freedom for peace and prosperity in Muslim majority countries and beyond. It was founded in 2011 to bring together researchers, academics, and public intellectuals to demonstrate the consistency of the universal values of religious, political and economic freedom with Islam. The ILN's annual programme includes an international conference, training workshops, and publishing articles, papers, podcasts and webinars which reach thousands of interested individuals. The organisation stated that the ILN functions as a foundation registered under Labuan rules, an off-shore federal territory in Malaysia.
2. You seek to take up an unpaid, part-time role as a Member of the Advisory Board. The ILN website states *'The members of our Advisory Board are eminent leaders of the civil society who provide intellectual support to the Foundation and share their valuable expertise in organizational development voluntarily.'*
3. You said that the Advisory Board:
  - comprises of members who perform their duties voluntarily
  - meets on an ad-hoc basis
  - has no fiduciary role or any role in appointments, but individual members may be consulted for suggestions on an ad-hoc basis
  - comprises of members who may be invited to attend the council meetings as an observer but with no voting rights

#### Dealings in office

4. You advised the Committee you did not meet with, nor make any policy or regulatory decisions specific to the ILN; nor do you have access to sensitive information of relevance.

#### Departmental Assessment

5. DHSC and DSIT confirmed the details you provided and stated:
  - that you were not involved in any decisions specific to the Islam & Liberty Network; and
  - that they did not consider you to have had any access to particular sensitive information that raises risks under the Rules.
6. The departments did not have any concern with the appointment and recommended the standard conditions.