



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Lord Kamall, former Parliamentary Under Secretary of State at the Department for Digital, Culture, Media and Sport (DCMS). Paid appointment with Acton Institute, Collins Centre for Abrahamic Heritage.

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) to join the Collins Centre for Abrahamic Heritage.
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 Collins Centre for Abrahamic Heritage. 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. There is no direct overlap with your time in office. The the Committee¹ noted you were briefly responsible for the Charity Commission which regulates UK registered charities - but this is a U.S based charity and think-tank.
6. You said you attended one or two online seminars and provided unpaid advice but in a personal capacity to the Acton Institute, not in your capacity as a minister.
7. DCMS confirmed that during your time as minister, you made no decisions relevant to the organisation.
8. The Committee therefore considered the risk is low that you could be seen to have been offered this role as a reward for decisions made, or actions taken, in office. There are inherent risks in relation to your access to information and your potential influence as a result of your time in office - though these are broad in nature and somewhat limited given the nature of the organisation and your proposed work.

The Committee's advice

9. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. While there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below will sufficiently mitigate this case.
10. The Committee advises, under the government's Business Appointment Rules, that your appointment with **Acton Institute, Collins Centre for Abrahamic Heritage** 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 Acton Institute, Collins Centre for Abrahamic Heritage Institute (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 Acton Institute, Collins Centre for Abrahamic Heritage Institute (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 Acton Institute, Collins Centre for Abrahamic Heritage Institute (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.

¹ This application for advice was considered by Jonathan Baume; Isabel Doverty; Sarah de Gay; The Rt Hon Lord Eric Pickles; Richard Thomas; Mike Weir and Lord Larry Whitty. Andrew Cumpsty was recused.

11. 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.
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.
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.*" This Rule is separate and not a replacement for the Rules in the House.
14. 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.
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. Its website says in 2022, the Acton Institute launched the Collins Center for Abrahamic Heritage to explore Jewish, Christian, and Islamic perspectives on the foundations of a free and virtuous society, advancing research and education from Jewish, Christian, and Islamic perspectives on economics, liberty, and human flourishing. It also said it works to deepen understanding of each tradition and build bridges of tolerance through dialogue on these topics. Its programs include international conferences, book publications, and network building.
2. You said in your paid, part-time role as Advisory Board Member, you would be asked to be present virtually at two annual advisory board meetings up to 90-minutes in duration: one meeting in the spring and one meeting in the fall and members may be

contacted by the Collins Center director for advice periodically throughout the year and you are being sighted to work on a 4 year term with the Institute.

3. You confirmed there is no contact with government in this role.

Dealings in office

4. You said you previously worked/interacted with the Acton Institute and due to their previous experience, you were offered this role. You said you attended one or two online seminars and gave some unpaid advice in a personal capacity to the Acton Institute.
5. You said you did not have any involvement in policy, regulatory or commercial decisions that would have been specific to the company.

Departmental Assessment

6. DCMS confirmed the details you provided and had no concerns about this appointment.
7. DCMS said you were responsible for the Charity Commission. DCMS confirmed there were no policy overlap or any policy or regulatory decisions made by you that would have affected or involved the Acton Institute (a US based charity), during your limited time at DCMS.