



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) & former Parliamentary Under Secretary of State for Technology, Innovation and Life Sciences at the Department of Health and Social Care (DHSC). Paid appointment to join Politeia.

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 Politeia.
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 Politeia as a Consultant. 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. You made no decisions specific to this organisation whilst in office. The Committee also noted you have some experience of working with think-tanks

prior to joining government. The risk that this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.

6. Politeia is a think-tank and therefore is interested in government policy. As with any former minister your time in office will have granted you access to sensitive information. However, your role is limited to a project on energy - a sector that is outside your responsibilities in office (and the departments- DCMS and DHSC). Further, you were only at DCMS for a short period of time (a matter of weeks) and it has been 5 months and a change in administration(s) since you were in office. The risks associated with your access to information are therefore limited.
7. As a former minister, there are inherent risks associated with your access to contacts. It is relevant that you stated your role will not have contact with government and your contract with Politeia will explicitly state your role will be in keeping with ACOBA's advice, which includes a lobbying ban as standard for former ministers under the Rules.

The Committee's advice

8. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Rules. While there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below will sufficiently mitigate this case. These seek to prevent improper use of influence, contacts and information from your time in office; and are in keeping with the role as you describe it.
9. The Committee advises, under the government's Business Appointment Rules, that your appointment with **Politeia** 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 Politeia (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 Politeia (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 Politeia (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.
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 Politeia is a non-profit think-tank. Its website says Politeia is a forum

for discussing economic, constitutional and social policy. It focuses on the role of the state in people's lives. Politeia aims to encourage the best policies for a free society under the rule of law, a prosperous economy based on free markets and competition, and excellent systems for education, health care and pensions.

2. It also says Politeia works with leading authorities from both Britain and abroad, pioneers from the legal profession, academic life, the economy, business and politics. With them, Politeia publishes up to date research and analyses, and makes proposals on which successful government policy can be based. It also hosts conferences and events to discuss the details of policy
3. You said in your paid, part time role as Consultant your role is to lead a new project called *'An Affordable Energy Policy for the UK - Making the Markets Work for Britain*. This will involve:
 - authoring or editing and co-authoring a publication ready for print
 - arranging an event to mark or precede publication, to discuss the themes with a panel 3-4 of specialists
 - supervising dissemination of the report and its findings
4. You said your contract with Politeia will contain the following clause: *'You acknowledge all duties under the terms of this contract shall be in accord with the House of Lords Code of Conduct, and advice from the Advisory Committee on Business Appointments (ACOBA) including the rules prohibiting paid parliamentary advice or services.'*
5. You said it is a paid, part time role being a few hours a week as needed up to June or July 2023, with the option of extending the project or taking on new projects.

Dealings in office

6. You advised the Committee that you were a guest speaker at two events on health services organised by two other think-tanks: Reform and the Institute of Economic Affairs whilst you were at DHSC.
7. You said you did not have any involvement in policy, regulatory or commercial decisions that would have been specific to the company.

Departmental Assessment

8. DHSC confirmed the details you provided. Both DCMS & DHSC confirmed they were unaware of any particular information you had access to and were content with this appointment subject to the standard conditions.