



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

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**BUSINESS APPOINTMENT APPLICATION: Amber de Botton, former Director of Communications at No.10, Cabinet Office. Paid appointment with Bridgepoint Advisers Ltd.**

1. Ms de Botton sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown Servants (the Rules) about taking up a role with Bridgepoint Advisers Ltd ("Bridgepoint") as Consultant.
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 Ms de Botton's time in office, alongside the information and influence a former Director of Communications at No 10 may offer Bridgepoint. 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.

**The Committee's consideration**

5. There is no relationship between Bridgepoint and the Cabinet Office, nor was Ms de Botton involved in any policy, regulatory or funding decisions specific to

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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 organisation. Therefore, the Committee<sup>2</sup> considered the risk that this appointment could be considered a reward was low.

6. As the former Director of Communications at No.10, Ms de Botton would have had access to sensitive information which may be seen to benefit any company she chooses to join. The Committee considered it significant that this is a general risk: her former department is not aware of any particular information she had access to which would raise a risk under the Rules and more than four months have passed since she last had any access to information in office.
7. As the former Director of Communications at No.10, there are risks associated with Ms de Botton's influence and network of contacts within government which could unfairly assist Bridgepoint. However, Ms de Botton confirmed her role will not involve any contact with the UK government; her role is internally focused on communications strategy for the internal communications team at Bridgepoint, involving directing the production of video communications. Moreover, this is a short-term role and so the risks are limited. It is significant that it is a communications role, and after a relatively short time in government service. Ms de Botton is returning to work that relates to her long-held career in the media and communications.

### **The Committee's advice**

8. There are risks associated with her general access to sensitive information and potential influence within government – though the Committee did not consider this appointment to raise any particular proprietary concerns under the government's Rules.
9. The conditions outlined below seek to prevent the improper use of information and contacts to the unfair advantage of Bridgepoint. These appropriately mitigate the risks in this appointment.
10. In accordance with the government's Business Appointment Rules, the Committee advises Ms de Botton appointment with **Bridgepoint Advisers Ltd** should be subject to the following conditions:
  - she should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time in Crown service;
  - for two years from her last day in Crown service, she should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of Bridgepoint Advisers Ltd (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage

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<sup>2</sup> This application for advice was considered by Andrew Cumpsty; Isabel Doerty; 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. Hedley Finn OBE was absent.

Bridgepoint Advisers Ltd (including parent companies, subsidiaries, partners and clients); and

- for two years from her last day in Crown service, she should not provide advice to Bridgepoint Advisers Ltd (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.
11. The advice and the conditions under the government's Business Appointment Rules relate to Ms de Botton's 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>3</sup>. 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.
  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. Ms de Botton must inform us as soon as she takes up employment with this organisation, or if it is announced that she will do so. Please also inform us if Ms de Botton proposes to extend or otherwise change the nature of her role as, depending on the circumstances, it may be necessary for her 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.

Yours sincerely

Dougie Thornton  
**Committee Secretariat**

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<sup>3</sup> 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

## **Annex - Material Information**

### The role

1. Ms de Botton described Bridgepoint as a London Stock Exchange-listed British private investment alternative asset fund management group. According to Bridgepoint's website, it is '... one of the world's leading private asset growth investors, specialising in private equity and private debt. With over €39.5bn of assets under management and a strong local presence in Europe, the US and China, we combine global scale with local market and sector expertise, consistently delivering strong returns through cycles'.
2. According to Ms de Botton, the role would:
  - be to support and deliver a communications strategy for the internal communications team at Bridgepoint, involving directing the production of video communications drawing on her experience in broadcasting (ITV News, Sky News), i.e. communications delivery and application, and practical video media
  - involve no engagement with government or advice on how to work with government
  - be in a different sector to, but will utilise the professional skills from, her former career in media, including directing video content and designing a media strategy.
3. Ms de Botton stated that her role would be focussed on communications delivery and application and practical video media.
4. She explained that the offer for project work arose after speaking about leaving government and deciding what to do next with Bridgepoint's Director of Communications, whom she had known professionally for over a decade and had worked on and off with during that time.

### Dealings in office

5. Ms de Botton advised the Committee that she had had no engagement with Bridgepoint during her time in government and had made no funding or contractual decisions affecting Bridgepoint.

### Departmental Assessment

6. The Cabinet Office confirmed the details provided and:
  - noted that, as an asset management firm, Bridgepoint would be regulated by the FCA
  - also raised that, in early December 2023, Bridgepoint had purchased the majority ownership of a company called 'Fera', a joint Capita / DEFRA venture; that DEFRA owned 25% of Fera, and that Capita had sold its 75% share to Bridgepoint for £62b; but clarified that there is no suggestion that she had any no knowledge or involvement in this during her time in government, which ended 3 months prior to this development.
7. The Cabinet Office recommended the standard conditions.