



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Dominic Raab MP, former Deputy Prime Minister and Secretary of State of the Ministry of Justice (MOJ) and Foreign Commonwealth and Development Office (FCDO), paid commission with the World Gold Council 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 the World Gold Council under your independent consultancy.
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 World Gold Council. 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. The Committee¹ considered this commission to be consistent with the description of your consultancy- providing advisory services to businesses in

¹ This application for advice was considered by Andrew Cumpsty; Dawid Konotey Ahulu CBE DL; Isabel Doverty; Michael Prescott; Mike Weir; Sarah de Gay; The Baroness Jones

the UK and internationally on geopolitical risk, financial, and commercial advice. These businesses are likely to include the financial services sector and those involved in supply chain management, for example, the shipping and logistics sector.

6. You were not involved in any decisions specific to the World Gold Council or its work in the gold industry whilst you were in office, nor is there a relationship between the company and your former departments. Therefore, the Committee considered there is limited risk that this commission can reasonably be perceived as a reward for decisions made in office.
7. There is some sectoral overlap during your time as Foreign Secretary, a role you left more than 2 years ago. In particular your involvement in the decision 3 years ago to help ensure that British companies were not complicit in, nor profiting from, human rights violations in Xinjiang. The MOJ and FCDO did not consider you to have access to information now that might offer an unfair advantage to the World Gold Council. It is significant that you have been out of office for 12 months which puts a significant gap between your access to information and this work .
8. As a former Deputy Prime Minister and Secretary of State for Justice, there are risks associated with your influence and network of contacts gained within government. The Committee was mindful that this organisation is a trade association and will have an interest in relevant government policy. The risk here is not significant because this is a short term project based commission to produce a report.

The Committee's Advice

9. There are risks associated with your general access to sensitive information, and potential influence within and outside government - particularly given the company operates within a sector which you had responsibility for as Secretary of State.
10. The Committee considered the conditions attached to your consultancy to appropriately mitigate the risks. They seek to prevent the improper use of information, contacts and influence to the unfair advantage of the World Gold Council.
11. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this commission with

of Whitchurch; and The Rt Hon Lord Eric Pickles. Hedley Finn OBE was unavailable.

the World Gold Council, 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;
- 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 the World Gold Council (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 the World Gold Council (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to the World Gold Council (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, you should not become personally involved in lobbying contacts you developed during your time in office and in other governments and organisations for the purpose of securing business for the World Gold Council ; and
- 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.

12. The advice and the conditions under the government's Business Appointment Rules relate to an individual's 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 an individual's responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.

13. 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.

14. 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.”*
15. 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.
16. 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

Commission with the World Gold Council

1. You said that the World Gold Council is an international trade association for the gold industry.
2. According to its website-it is a membership organisation that focuses on how gold is a strategic asset. It builds understanding of gold and its possibilities through research, analysis, commentary, and insights. Further, it seeks to shape policy in the gold industry by setting standards.
3. You said that you will be a consultant with the World Gold Council and you said your role will entail:
 - writing a ‘White Paper’ report on artisanal mining in the gold sector. It will cover how to prevent human rights abuses and exploitation of artisanal miners and prevent profits from such exploitation from funding illegal organisations.
4. You said your role would not involve any contact or dealings with government.

Dealings in office

5. You advised the Committee you did not meet with the World Gold Council while in service and you were not involved in any commercial or contractual decisions relating to the World Gold Council. You also told the Committee you did not have any involvement in any relevant policy development or decisions that would have affected the World Gold Council and did not meet with its competitors; nor did you have access to sensitive information regarding these competitors.

Department assessment

6. The Ministry of Justice (MOJ) and the Foreign Commonwealth and Development Office (FCDO) confirmed the details you provided. The MOJ added:
 - As Foreign Secretary you made a decision 3 years ago to help ensure that British companies were not complicit in, nor profiting from, human rights violations in Xinjiang.²
7. The MOJ and FCDO recommended standard conditions.

²<https://www.gov.uk/government/news/uk-government-announces-business-measures-over-xinjiang-human-rights-abuses> and <https://www.theguardian.com/world/2021/jan/12/chinas-treatment-of-ughurs-amounts-to-torture-dominic-raab>