

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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Government's Business Appointment Rules Application: The Rt Hon Suella Braverman KC MP, former Secretary of State for the Home Department and Attorney General. Paid appointment with CWG Speakers.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former ministers (the Rules) seeking advice on taking up an appointment as a speaker with CWG Speakers.
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 CWG Speakers. The material information taken into consideration by the Committee is set out in the annex below.
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. The Committee¹ does not consider joining a speaking agency raises any particular concerns under the government's Business Appointment Rules, provided it is subject to standard conditions which prevent improper use of information and influence. These cases will normally be subject to the standard conditions below after checking with your former department. It is an individual's responsibility to manage the propriety of the specific pieces of work undertaken. In particular, as the former Prime Minister, you must be careful not to offer any unfair insight as a result of your access to information and potential influence in government - which the conditions below seek to mitigate.
6. The Committee noted you did not meet with nor have any official dealings with CWG Speakers in office, and therefore the risk this role could reasonably be seen as a reward for decisions made, or actions taken, in office is low.

The Committee's advice

7. The Committee did not consider this appointment raises any particular propriety concerns under the government's Rules. The standard conditions below appropriately mitigate the risks associated with withdrawing on privileged information and using your contacts and influence within government to the unfair advantage of CWG Speakers.
8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **CWG Speakers** 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 CWG Speakers (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 CWG Speakers (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 CWG Speakers (including parent companies, subsidiaries,

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

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.

9. 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. You are reminded that all Members of Parliament have a separate ban on paid lobbying under the Parliamentary Code of Conduct, whilst they remain a sitting MP². 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. 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.
11. 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.*"
12. You must inform us as soon as you take up employment with this organisation. Similarly you must 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.
13. 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 in the annual report.

The Rt Hon Lord Pickles

² Advice on your obligations under the Code can be sought from the Parliamentary Commissioner for Standards.

Annex - Material information

The role

1. You informed the Committee you wish to take up a paid, part-time role as a Speaker with CWG Speakers - a speaking agency. It will handle potential speaking engagements on your behalf.
2. You confirmed this role would not involve contact with government.

Dealings in office

3. You did not meet with CWG Speakers while in office and there is no relationship between CWG and your former departments. You also confirmed you did not have any involvement in policy, nor did you make any decisions relevant to CWG while in office.

Department Assessment

4. The Home Office and Attorney General's Office confirmed the details you provided in this application.
5. The departments did not have any concerns with regards to this application and recommended the standard conditions.