



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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April 2024

BUSINESS APPOINTMENT APPLICATION: Paul Scully MP, former Parliamentary Under Secretary of State (Minister for Technology and the Digital Economy). Paid appointment with Adiona Gibraltar Ltd.

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 a paid role as the Chairman of Adiona Gibraltar Ltd (Adiona).
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 Adiona, as a former minister. 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 did not make any policy, regulatory or commercial decisions that would have affected Adiona specifically. Although you had some indirect contact with Adiona in your capacity as a minister, this was limited to wider stakeholder

events. Therefore, the Committee¹ considered that the risk this role could reasonably be seen as a reward for your decisions in office is low.

6. As the former Parliamentary Under Secretary of State (Minister for Technology and the Digital Economy), your appointment with Adiona has some sectoral overlap with your time in office. You were involved in policy matters relating to artificial intelligence and technology start-ups generally. The risk associated with your access to information is limited because:
 - your policy involvement was not specific to Adiona;
 - your former departments said that whilst you had access to information relating to the technology sector, nothing significant remains unannounced or unchanged since you left office; and
 - you have been out of office for over 5 months, limiting the currency of the information you had access to.
7. As a former minister, your contacts and influence across government could offer Adiona an unfair advantage. You confirmed that your proposed role would not involve any contact with government.

The Committee's advice

8. The Committee considered conditions below are sufficient to mitigate the risks related to this role. These seek to prevent you from making use of privileged information, contacts and influence gained from your recent time in ministerial office to the unfair advantage of Adiona.
9. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Adiona Gibraltar Ltd** 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 any of its arm's length bodies on behalf of Adiona Gibraltar Ltd (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

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

Adiona Gibraltar Ltd (including parent companies, subsidiaries, partners and clients); and

- for two years from your last day in ministerial office, you should not provide advice to or on behalf of Adiona Gibraltar 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.
10. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; there are separate 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.² You are reminded that as a Member of Parliament you have a separate ban on paid lobbying under the Parliamentary Code of Conduct. 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.
 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.*"
 13. You must inform us as soon as you take up employment with this organisation(s), or if it is announced that you will do so. Please 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.

² All Peers and Members of Parliament are prevented from paid lobbying under the 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

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 that Adiona is an insurance managing general agent. It is an 'insurtech' start-up. Its website said it is developing smart technology to obtain driving data which is used to reflect the cost of motor insurance, helping to increase driver fairness and transparency. The insurance cost is then based on the individual's driving rather than algorithms and averages/driving data of other drivers. Adiona has partnered with Duck Creek Technologies, a provider of core system solutions to the insurance industry, to provide motor insurance³ to UK consumers.

2. You wish to take up a part-time, paid role as Chairman. You said that your responsibilities will be:
 - chairing four board meetings a year with ad-hoc duties
 - leadership and governance – providing leadership to the board of directors, ensuring effective governance and adherence to regulatory requirements
 - strategy and development – working with the board and senior management team to develop and approve the company's strategic objectives and plans.
 - risk management – ensuring the company has appropriate risk management strategies in place
 - stakeholder communication – acting as a key representative of the company, including some communication with stakeholders, regulators and investors
 - performance oversight – monitoring the company's financial performance and ensuring it meets targets and remains profitable
 - relationship building– building and maintaining relationships with key clients, insurers and other industry players
 - compliance – ensuring the company operates within the legal and regulatory framework, and that internal controls are effective
 - succession planning– planning for the succession of key leadership roles within the company.

You said that your role will not involve contact with government.

3. You mentioned in your application that you had experience of the motor insurance industry, having worked for Eagle Star (now Zurich) as an assistant

3

<https://www.duckcreek.com/blog/duck-creek-and-adiona-team-up-to-revolutionise-uk-motor-insurance-with-multi-faceted-saas-solution-and-scalable-business-model/>

underwriter in 1988. You also attended meetings with the Association of British Insurers as an MP, prior to 2020.

Dealings in office

4. You said that you have had indirect contact with Adiona whilst in office:
 - Paul Harvey, the CEO of Adiona, attended a roundtable hosted by the Founders Forum in October 2023, in the lead up to the AI Safety Summit, which you chaired. He was one of approximately 20 founders in attendance.
 - Mr Harvey was also in attendance at a fireside chat that you held in October 2023 at Birmingham Tech Week.
5. You said that DSIT does not have a departmental relationship with Adiona, nor did you make any policy, regulatory or commercial decisions specific to Adiona.

Departmental assessment

6. DSIT confirmed that you had limited and indirect contact with Adiona- when Paul Harvey (the CEO of Adiona) attended a roundtable hosted by the Founders Forum in October 2023. It had no record of Paul Harvey's attendance at a fireside chat at Birmingham Tech week, but noted that there was a large audience in attendance.
7. DSIT said that you did not make any policy, regulatory or commercial decisions that would have affected Adiona specifically. You did make decisions affecting the tech sector as a whole:
 - you would have been involved in policy decisions on issues such as how to support tech start-ups and investment in the area. The Secretary of State would have been the final decision maker. DSIT said that most of these decisions would have been in relation to fiscal events that have already happened
 - prior to the Department for Media, Culture and Sport splitting from DSIT (in February 2023) you were minister responsible for AI policy. You were sighted on the government's AI regulation white paper response, published in March 2023, and updated since you left office⁴. policies will now have been made public or policy positions (e.g. on the Digital Markets Bill or AI regulation) will now have changed.

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<https://www.gov.uk/government/consultations/ai-regulation-a-pro-innovation-approach-policy-proposal/outcome/a-pro-innovation-approach-to-ai-regulation-government-response>

8. DSIT recommended the standard conditions.