

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Lee Rowley, former Minister for Housing, Ministry of Housing, Communities, and Local Government. Paid appointment with InvestIN.

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 an appointment you wish to take up with InvestIN as a Lecturer.
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 you made during your time in office, alongside the information and influence you may offer InvestIN. 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. The Ministry of Housing, Communities and Local Government¹ (MHCLG) confirmed that you did not meet with InvestIN, nor did you make any decisions - policy, regulatory or commercial - specifically affecting InvestIN. The Committee² therefore considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
6. As a former minister, there are inherent risks associated with your access to privileged information from your time in government. The risks here are limited given this is a teaching role with no direct overlap with your responsibilities as a minister at MHCLG.
7. There are inherent risks associated with any former minister's network of contacts and influence in government. The risks are limited given the nature of this role - you will have no contact with the government; and because this is a time-limited academic role.

The Committee's advice

8. The Committee did not consider this appointment raises any particular propriety concerns under the government's Rules, subject to the conditions below. These make it clear that you cannot make use of your access to privileged information, contacts or influence gained from your time in ministerial office to the unfair benefit of InvestIN.
9. The Committee advises, under the government's Business Appointment Rules, that your role with **InvestIN** should 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 government or its arm's length bodies on behalf of InvestIN (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 to influence policy, secure business/funding or otherwise unfairly advantage InvestIN, including parent companies, subsidiaries, partners and clients); and

¹ Following the General Election in June 2024, the Department for Levelling Up, Housing and Communities is now named as the Ministry of Housing, Communities and Local Government.

² This application for advice was considered by Andrew Cumpsty; Sarah de Gay; The Rt Hon Lord Pickles; Mike Weir; David Konotey-Ahulu CBE DL; Hedley Finn OBE; Michael Prescott; and Isabel Doverty.

- for two years from your last day in ministerial office, you should not provide advice to InvestIN (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 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 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.³ 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 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

³ 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 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. InvestIN's website states that it '*...offers 15-18 year olds the chance to test drive their dream career, through our range of immersive career experiences. On our programmes, students gain up to two weeks of hands-on experience alongside top industry professionals, enabling them to make the right career decisions and maximise their potential.*' InvestIN is part of the wider group, Dukes Education, which also runs nurseries, schools, and colleges in the UK alongside university application support, university experiences, day camps, tuition, and summer schools.
2. You informed the Committee that you wish to take up a paid, part-time appointment as a teacher/lecturer, teaching on the summer programme at InvestIN. You said that you will be teaching students how the UK Parliament works, how government runs and the job of Members of Parliament. You confirmed your role will not involve contact with the UK government.

Dealings in office

3. You advised the Committee that during your time as Housing Minister you did not meet with or make any decisions specific to InvestIN. You said that you did not have any access to sensitive information that could grant InvestIN an unfair advantage.

Department Assessment

4. MHCLG confirmed the details you provided and recommended standard conditions be applied.