



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: George Freeman MP, former Minister of State for Science, Research and Innovation. Rejoining your paid consultancy work with Regeneration Advisory 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 to return as Director and a Shareholder of Regeneration Advisory Ltd- an independent consultancy focussed on supporting regeneration projects across the UK.
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 your consultancy, 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 and Advice

Consultancy

5. You propose to return to the independent consultancy that you established in 2021,¹ as its Director and a shareholder. You described Regeneration Advisory Ltd as an advisory business to support regeneration projects across the UK to harness innovation led growth and inward investment.
6. It would not be improper for you to operate a consultancy that draws on generic skills and experience you have gained from your time as a minister and previous experience in regional clusters and regeneration projects. However, given the broad reaching nature of regeneration projects in the UK, and that Regeneration Advisory Ltd's clients are unknown, the risks are hard to quantify. As Minister of State for Science, Research and Innovation, you will have had access to a wide range of information about the science and technology sectors. There is a risk that you could offer your clients an unfair advantage should they operate in industries that overlap with your work in office.
7. The Committee² agreed with the Department for Science, Innovation and Technology (DSIT) that the risks associated with your access to information and decisions made in office are limited given the mitigating factors outlined below:
 - The only specific matters identified by DSIT as overlapping are now in the public domain, leaving a limited risk associated with your access to information in general whilst at DSIT.
 - you have been out of office for 10 months, creating a gap between your work with Regeneration Advisory Ltd and your access to information;
 - there has been a change in government and you cannot know what policy decisions will be made, though you may retain some privileged insight.
8. There is also a risk that you may use contacts built up whilst in ministerial office, in external organisations, to gain clients or raise funds for your consultancy. For example, contacts made in the private sector and possibly in science, research and development.
9. The Committee also recognised you have a background and skills and experience in a similar area outside of your time in government; alongside a network from this experience that you can draw upon.

¹ ACOBA advised on this in April 2021, as you were subject to the government's Business Appointment Rules at the time - https://assets.publishing.service.gov.uk/media/60803bd3d3bf7f01308d9b94/Advice_Letter_-_GF__In_dependent_Consultancy_.pdf

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

10. This advice provides you consent only to set up a consultancy, subject to a number of conditions. It does not give you consent in relation to any possible future clients. You must seek advice in relation to each client, so that risks can be assessed and it will need to be demonstrated by you and former departments that the work would be appropriate under the Rules.

Future Commissions

11. You must seek advice from the Committee for each commission/client you wish to accept. Whether the conditions set out below can sufficiently mitigate the risk presented by any future commission you propose to take up will depend on the specific details of each piece of work. Any failure to seek advice before accepting work would be a breach of the Rules and treated as such - including reporting breaching to government.

12. The risks under the Rules will be most significant where you seek to provide advice on matters where you made decisions or had access to sensitive information in office - these applications will need close scrutiny. The Committee will want to carefully consider the suitability of this work, and may advise that a further waiting period is required. Where conditions and a suitable waiting period cannot appropriately mitigate the risks, the Committee may advise the work is unsuitable³ to take up within the two years the Rules apply. The Committee will consider such risks on a case by case basis.

13. All potential clients must be notified of this advice, and when seeking work/new clients, you must adhere to the conditions below. Under the Government's Business Appointment Rules, the Committee advises that **Regeneration Advisory Ltd**, should be subject to the conditions set out below:

- 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 those you advise under your independent consultancy (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

³ Should an applicant subsequently take up or announce this work, ACOBA will publish relevant information.

otherwise unfairly advantage those you advise under your independent consultancy (including parent companies, subsidiaries, partners and clients);

- for two years from your last day in ministerial office, you should not provide advice to or on behalf of those you advise under your independent consultancy (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 or raising funds for your independent consultancy or its clients; and
- for two years from your last day in ministerial office, before accepting any clients/commissions for your independent consultancy and or/before extending or otherwise changing the nature of your work, 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.

14. 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.⁴ 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.

15. 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 Ministerial Code or otherwise.

16. The Business Appointment Rules explain that the restriction on lobbying means that you "should not engage in communication with government (ministers, civil servants, including special advisers, and other relevant

⁴ 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.

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".

17. 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 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.

18. Once the appointment(s) 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

Independent consultancy

1. You said that Regeneration Advisory Ltd is an advisory business to support regeneration projects across the UK to harness innovation led growth and support inward investment. You originally set up Regeneration in 2020 after leaving government - for which you sought and received ACOBA's advice in April 2021 in relation to - https://assets.publishing.service.gov.uk/media/60803bd3d3bf7f01308d9b94/A_dvice_Letter_-_GF_Independent_Consultancy_.pdf.
2. You said you were previously the Director of Regeneration Advisory Ltd but stepped down when he returned to government in 2021. The company has since been run by your wife as a vehicle for her consulting/ advisory work and the establishment of Regeneration Theatre Company for arts outreach. You wish to take up this role again and will be responsible for fundraising, business planning, strategic planning and governance. You said you will be involved in no activity that would fall within the definition of lobbying the government.
3. Prior to becoming a minister, you said your previous work focussed on science and technology consulting, corporate finance advisory, and investing. From 1996 to 2010, you worked for the Cambridge Cluster,⁵ founding and

⁵ <https://www.cambridgenetwork.co.uk/the-network/cambridge-cluster>

financing high growth technology companies and promoting industries in biology and life sciences.

Dealings in office

4. You said that you did not make any policy, regulatory or commercial decisions relevant to Regeneration Advisory Ltd during your time in office. You said that Regeneration Advisory Ltd does not have a particular relationship with government, nor did you meet with the company in your capacity as a minister.

Departmental assessment

5. DSIT said that you were involved in policy relating to the development of the Innovations Cluster Map⁶, which identifies innovation clusters across the UK and is part of a tool used to encourage inward investment. However, this information has now been published.
6. DSIT said as a minister, you would have access to a wide range of information in many areas of science and technology, on which you could provide advice in a consulting or advisory capacity. However, it noted nothing specific.
7. DSIT recommended standard conditions.

⁶ <https://www.innovationclusters.dsit.gov.uk/>