



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon The Lord Cameron of Chipping Norton, former Secretary of State for Foreign, Commonwealth and Development Affairs. Paid appointment with PayCargo LLC.

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 Chair of the Advisory Board for PayCargo LLC (PayCargo).
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 PayCargo. 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. You did not make any policy, regulatory or commercial decisions specific to PayCargo whilst in office, nor did you meet with the company in office. There is no known overlap with PayCargo and your responsibilities in office. Therefore,

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

6. As Foreign Secretary, there are risks associated with your access to privileged information. The risks are limited given there is no direct overlap between your role in government and your proposed role with PayCargo. It is also relevant that as a former Cabinet minister, you are subject to a three month waiting period. This creates a gap between your access to information and your employment with PayCargo.
7. There are risks associated with your influence and network of contacts gained whilst in ministerial office. In particular, part of your role with PayCargo is focussed on advising the board on the company's global expansion. You said that your role will not involve contact with government. Further, as a former Prime Minister you have an existing wide range of contacts. Whilst limited, there remains a risk you may be seen to draw on contacts in the private sector and foreign governments only gained as a result of your recent role in office.
8. It is relevant that you are resuming a role with PayCargo, having previously been Chair of the Advisory Board from 2022 to 2023 prior to rejoining government.

The Committee's advice

9. The Committee determined the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information, contacts or influence gained from your time as Foreign Secretary to the unfair advantage of PayCargo. As a former member of the Cabinet, you are subject to a standard three month waiting period.
10. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **PayCargo LLC** be subject to the following conditions:
 - a three month waiting period from your last day in office;
 - 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;

¹ 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.

- 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 PayCargo LLC (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 PayCargo LLC (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 PayCargo LLC (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 as Foreign Secretary in other governments and organisations for the purpose of securing business for PayCargo LLC.

11. 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.² You are reminded that as a Member of the House of Lords you are prevented from any paid lobbying under the House of Lords 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.

12. 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.

13. 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*

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.

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."

14. You must inform us as soon as you take up employment with this organisation, 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.
15. 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. PayCargo is an online financial platform for money moving and information about remittance between payers and vendors in the cargo/ freight logistics industry. Its website says it allows payers, vendors, and freight brokers to settle accounts within a standardised, secure platform. PayCargo is based in the US. PayCargo does not have a known relationship with the UK government.
2. You wish to take up a part-time, paid role as Chair of the Advisory Board for PayCargo. You said your role will be to serve as Chairman of PayCargo's Advisory Board, providing strategic advice with a particular emphasis on international expansion and global risk. You said that your role will not involve contact with the UK government.
3. You said you had previously held the role of Chair of the Advisory Board for PayCargo from 2022- 2023; your role was paused upon your return to government. You did not need to seek ACOBA advice for this previous role because more than 2 years had passed since you had left office in 2019.

Dealings in office

4. You said that you did not meet with PayCargo in your capacity as Foreign Secretary, nor does PayCargo have a relationship with the FCDO or the UK

government. You said that you did not make any policy, commercial or regulatory decisions specific to PayCargo in ministerial office.

Departmental assessment

5. The FCDO confirmed the information provided in your application.
6. The FCDO recognised that with the focus of your role on global expansion for PayCargo, you could use contacts external to government but gained in office to the unfair advantage of PayCargo.
7. The FCDO recommended standard conditions and a condition to prevent you from lobbying contacts gained in post that are outside of government to gain business for the company.