



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)

Website: <http://www.gov.uk/acoba>

December 2024

**BUSINESS APPOINTMENT APPLICATION: Nerissa Chesterfield, former Director of Communications at No.10 Downing Street. Paid appointment with Chelsea FC Holdings Limited.**

1. Ms Chesterfield sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown Servants (the Rules) on taking up a role with Chelsea FC Holdings Limited (Chelsea FC) as Director of Corporate Communications and Affairs.
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 Ms Chesterfield's time in office, alongside the information and influence she may offer Chelsea FC. 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 Rules set out that Crown servants must abide by the Committee's advice<sup>1</sup>. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants 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

---

<sup>1</sup> Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code

5. As an English major professional football club, Chelsea FC is a significant stakeholder to the UK government. As the former Director of Communications at No.10, Ms Chesterfield's role had some overlap with the proposed role with the club. Ms Chesterfield:

- had contact with representatives of various sports organisations as a guest – the Premier League and Football Association as a guest at a number of football matches and as well as tennis games gifted by the Lawn Tennis Association;
- had no contact with the corporate management of Chelsea FC during her time in post;
- was not involved in any policy, regulatory or commercial decisions specific to Chelsea FC or its competitors.

As such, the Committee <sup>2</sup> considered the risk that this role could reasonably be perceived as a reward for decisions or actions in office is low.

6. Given her former role as Director of Communications at No.10, this appointment has a general overlap with Ms Chesterfield's work in government. There is a risk she may possess information which may be of interest to any employer, including Chelsea FC. The Committee agreed with the Cabinet Office that there are a number of mitigating factors that help reduce the risks associated with Ms Chesterfield's access to information:

- The Prime Minister is ultimately responsible for all UK government decisions, with media and sport policy and regulation the responsibility of the Department of Culture, Media and Sport (DCMS).
- Her role focussed on communications at No.10, not policy or operational decisions.
- Her access to information was, for the most part, about external communications, meaning the vast majority of information she had access to was about information ready to be placed in the public domain at the time or in the relatively near future.
- While she would have been privy to a wide array of sensitive information, any material commercial benefit is limited by the lapse of over seven months since she had last had access as well as change in government administration.
- The Cabinet Office considered the currency of any information she had access to some months ago is reduced by the rapid turnover of information in the public domain.
- The Cabinet Office is not aware of any access to information that would raise particular risks under the Rules.

---

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

7. The Committee considered there are risks associated with Ms Chesterfield's influence and network of contacts in government. Particularly, as she seeks to take up a role that operates in Chelsea FC's wider comms and strategy – which could be construed as seeking to influence the UK government on behalf of Chelsea FC, especially in the UK government's consideration of football regulation. This would be contrary to the lobbying ban which applies to all former senior civil servants for two years on leaving office.

#### The Committee's advice

8. The Committee considered there are limited risks associated with Ms Chesterfield's access to information. Whilst there is a general overlap, the company's operation is not directly related to her responsibilities in office, with sport and media policy regulation sitting with other parts of government.
9. Ms Chesterfield confirmed she will not have contact with, nor will she lobby government, in line with the expectations set out in the Rules. However, as this is a wide ranging communications role, there is a risk she may be perceived to offer Chelsea FC unfair access to government. Therefore, the Committee's advice is that Ms Chesterfield should have no direct engagement with the UK government on behalf of Chelsea FC whilst she is subject to the Rules. Any contact initiated by the government would not be contrary to Rules or the Committee's advice. It is significant that Chelsea FC confirmed it will put in place appropriate restrictions, conditions and limitations as a condition of Ms Chesterfield's employment, in compliance with Committee's advice as set out in paragraph 10 below.
10. The Committee's advice in accordance with the government's Business Appointment Rules is that this role with **Chelsea FC Holdings Limited** be subject to the below conditions:
  - she should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time in Crown service;
  - for two years from her last day in Crown service, she should not become personally involved in lobbying the UK government or any of its arm's length bodies, on behalf of Chelsea FC Holdings Limited (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage Chelsea FC Holdings Limited (including parent companies, subsidiaries, partners and clients);

- for two years from her last day in Crown service, she should not provide advice to Chelsea FC Holdings Limited (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; and
- for two years from her last day in Crown service, she should not initiate engagement with the UK government or its arm's length bodies on behalf of Chelsea FC Holdings Limited (including parent companies, subsidiaries, partners and clients).

11. The advice and the conditions under the government's Business Appointment Rules relate to an individual's 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<sup>3</sup>. 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 Ministerial Code/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 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. Ms Chesterfield must inform us as soon as she takes up this work or if it is announced that she will do so. Similarly, she must inform us if she proposes to extend or otherwise change her role with the organisation as depending on the circumstances, it might be necessary for her to seek fresh advice.

---

<sup>3</sup> 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.

15. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Hamzah Rizvi  
**Committee Secretariat**

## **Annex – Material Information**

### The role

1. Chelsea FC is a professional football club based in Fulham, West London, England. As a major football club operating in the English football league system, it is a stakeholder to the UK government as the Department for Culture, Media and Sport (DCMS) regulates matters relating to professional football in the UK.
2. In her paid, full time role as Director of Corporate Communications and Affairs, Ms Chesterfield stated her role involves:
  - Leading on the football club's strategic communications, day to day reactive communications, crisis management and media relations.
  - Shaping and delivering Chelsea FC's strategic messaging in close collaboration with the board and owners.
  - Engaging with relevant stakeholders and communicating the club's objectives.
  - No contact with, or lobbying of, government.
3. ACOBA contacted Chelsea FC to ensure this role could be adequately separated from any lobbying work. Ms Chesterfield and Chelsea FC confirmed it will adhere to the Rules and conditions of the Committee's advice, as set out in paragraph 10 of the advice letter, for the remainder of the period of two years since she left government.

### Dealings in office

4. Ms Chesterfield informed the Committee that she was not involved in policy, commercial or regulatory decisions specific to Chelsea FC or its competitors. She added that she did not have access to sensitive information, commercial or otherwise, specific to the Chelsea FC or its competitors.

5. Ms Chesterfield stated she met with representatives with the Premier League and Football Association informally as a guest at a number of football matches hosted by both in 2022 & 2023 (and declared as part of her transparency returns whilst she was in post<sup>4</sup>). She stated she had no contact with the corporate management of Chelsea FC during her time in post.

#### Departmental assessment

6. The Cabinet Office confirmed the details that Ms Chesterfield provided including that she made no decisions specific to Chelsea FC. It also confirmed the nature of her interactions with the Premier League and Football Association as noted above. It also added that Ms Chesterfield has also received gifts from sports organisations including;
  - June 2023: Concert tickets from the Premier League.
  - June 2021: Euros Ticket from the Football Association.
  - June 2021: Tickets to watch Wimbledon from the Lawn Tennis Association<sup>5</sup>
  - July 2021: Tennis Ticket from Lawn Tennis Association<sup>6</sup>
7. The Cabinet Office confirmed Ms Chesterfield did not have access to sensitive or commercially confidential information specific to Chelsea FC or its competitors. It added:
  - While she would have been privy to a wide array of sensitive information, any material commercial benefit is limited by the lapse of over 7 months since she had access to information; and
  - The currency of any such information she may possess is reduced by the rapid turnover of information in the public domain and change in government administration; and
  - It is not aware of any access to information that would raise particular risks under the Rules.
8. The Cabinet Office confirmed it does not have a relationship with Chelsea FC, though it noted Chelsea FC is a stakeholder to DCMS, stating:

---

4

[https://assets.publishing.service.gov.uk/media/65ccd38dc96cf3000c6a3753/Number\\_10\\_special\\_advisers\\_hospitality\\_April\\_to\\_June\\_2023\\_\\_2\\_.csv/preview](https://assets.publishing.service.gov.uk/media/65ccd38dc96cf3000c6a3753/Number_10_special_advisers_hospitality_April_to_June_2023__2_.csv/preview)

5

[https://assets.publishing.service.gov.uk/media/6171816de90e07197b571cc2/Transparency\\_Treasury\\_SpAds\\_hospitality\\_April-June\\_2021.csv/preview](https://assets.publishing.service.gov.uk/media/6171816de90e07197b571cc2/Transparency_Treasury_SpAds_hospitality_April-June_2021.csv/preview)

6

[https://assets.publishing.service.gov.uk/media/61fa63ef8fa8f538882511cd/SpAd\\_Transparency\\_hospitality\\_July-September\\_2021.csv/preview](https://assets.publishing.service.gov.uk/media/61fa63ef8fa8f538882511cd/SpAd_Transparency_hospitality_July-September_2021.csv/preview)

- DCMS is currently considering legislation that would establish a regulator for the championships that Chelsea play within<sup>7</sup> <sup>8</sup>. This is following attempts to establish the European Super League, which Chelsea would have been a member of <sup>9</sup>.
- The Cabinet Office also noted that Chelsea FC does indirectly receive some public funding in the costs of policing outside the stadium, this is paid from the devolved Greater London Authority <sup>10</sup>.

9. The Cabinet Office provided its concerns regarding the perceived risk of lobbying as part of Ms Chesterfield's appointment:

- It noted that the government's manifesto to include a provision to establish a new independent football regulator for professional men's clubs in the English football pyramid will have a material impact on Chelsea FC's operations in professional football and for which there is considerable public and parliamentary scrutiny. It is likely that there are lobbying campaigns that will seek to influence the final provisions of the Football Governance Bill<sup>11</sup> and it may be possible that Chelsea FC could be engaged with such activity.

10. The Cabinet Office recommended the standard conditions would be sufficient to mitigate the potential risk of unfair influence in this case.

---

<sup>7</sup> <https://www.bbc.co.uk/sport/football/articles/c80xdlz0ynjo>

<sup>8</sup> The DCMS published a football governance white paper in February 2023 that introduced plans to establish an independent regulator for English football.

<sup>9</sup> <https://www.chelseafc.com/en/news/article/club-statement4>

<sup>10</sup> <https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/cost-policing-football-matches>

<sup>11</sup> <https://bills.parliament.uk/bills/3832>