

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Anne-Marie Trevelyan, former Minister of State for Indo-Pacific. Paid appointment with Fullbrook Strategies Ltd.

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 your role as an Advisor with Fullbrook Strategies Ltd (Fullbrook Strategies).
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 Fullbrook Strategies. 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 this appointment in any other respect - 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. Fullbrook Strategies is an international PR, crisis management, and political campaigns company. It has been registered as a consultant lobbyist with the Office for the Registrar of Consultant Lobbyists since June 2022. It advises clients both in the UK and internationally on political and non-political issues. In your role as an advisor, you said that you will oversee a non-lobbying unit, building and overseeing teams that will run political campaigns, drawing on your skills and experience over eight general election campaigns.
6. You made no decisions - commercial, policy or otherwise in office that were specific to the company. The Committee¹ considered the risk that this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
7. As a former minister, there are risks associated with your access to privileged information. You had sight of information specific to your role as Minister of State for Indo-Pacific. Alongside matters of foreign policy, this included export control decisions and transactions that may involve a national security concern under the National Security and Investment Act 2021. This risk is limited given there is no specific information that your former department is aware of that could offer an unfair advantage to the company. The Committee considered that this risk is mostly likely to arise if your work at Fullbrook Strategies overlaps with your responsibilities in office. Given that the nature of the specific clients you will be working with is unknown, this risk requires mitigation to limit the opportunity for a conflict to arise.
8. Fullbrook Strategies' work includes seeking to influence the government on behalf of clients. The nature of this company as a lobbying firm presents a significant risk that you could offer unfair access to the UK government. You have said that your role will be separate from lobbying and will not involve contact with the government. Given the high risk of lobbying, real or perceived, the Committee sought confirmation from Fullbrook Strategies that your role can and will be separated from its lobbying activities as described.

The Committee's advice

9. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information or influence gained from your time in ministerial service to the unfair advantage of Fullbrook Strategies and/or its clients. In particular, given its unknown clients, you should not advise on work that arises where it

¹ This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; Sarah de Gay; The Rt Hon Lord Pickles; Michael Prescott; and Mike Weir. Dawid Konotey-Ahulu CBE DL was absent.

relates to matters you had a specific role in developing or determining during your time as Minister of State for Indo-Pacific.

10. The Committee considered it significant that Fullbrook Strategies confirmed there will be no lobbying of the government in this role, in line with the expectations set out in the Rules. Further, your contract will reflect that.
11. The Committee advises, under the government's Business Appointment Rules, that this appointment as Advisor with **Fullbrook Strategies Ltd**, 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 Fullbrook Strategies (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial service to influence policy, secure business/funding or otherwise unfairly advantage Fullbrook Strategies (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office, you should not undertake any work with Fullbrook Strategies (including parent companies, subsidiaries, partners and clients) that involves providing advice 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; and
 - for two years from your last day in ministerial office, you should not advise Fullbrook Strategies (including parent companies, subsidiaries, partners and clients) on work with regard to any policy you had a material role in developing or determining; or where you had a relationship with the company or organisation during your time as Minister of State for Indo-Pacific at the FCDO.
12. 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 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.

13. 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.
14. 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.*"
15. 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.
16. 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

² 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. According to its website, Fullbrook Strategies is an international PR, crisis management, and political campaigns company. It provides high-level advice to people and companies with complex problems, both in the UK and internationally, and of a political and non-political nature. It also provides political and business research, and election campaigns. Fullbrook Strategies has been registered as a consultant lobbyist with the Office for the Registrar of Consultant Lobbyists since June 2022.³
2. You said that you were approached by the Director, Mark Fullbrook,⁴ for this role. As an Advisor, you said that you will:
 - a. provide strategic advice to Fullbrook Strategies and oversee a non-lobbying unit at the firm; and
 - b. build and oversee teams that will run political campaigns, drawing on your experience of fighting in eight general election campaigns.
3. You said that it will not involve any lobbying or contact with government.
4. Mr Fullbrook of Fullbrook strategies has provided confirmation that your employment contract will '*...preclude lobbying on behalf of [Fullbrook Strategies] or any of its clients and also contain a clause reflecting the terms of our standard contract making it clear that, in all cases, the advice and guidance of ACOBA will be legally paramount for the period of your employment to which the ACOBA advice applies.*'

The contract clause is as follows:

'Where any of the staff (referred to in schedule 2) provided by [Fullbrook Strategies] to the Client are subject to advice and authorisation provided by the government Advisory Committee on Business Appointments (ACOBA), the Services will be provided in compliance with such advice and only provided after such advice has been received and approved by [Fullbrook Strategies]. For the avoidance of doubt where the terms of this Agreement and the advice and authorisation provided by ACOBA come into conflict the advice and authorisation provided by ACOBA shall be paramount.'

Dealings in office

³ https://orcl.my.site.com/CLR_Public_Profile?id=0014J00000k01NMQAY

⁴ ACOBA advised Mark Fullbrook on founding Fullbrook Strategies after he left office in 2022: <https://www.gov.uk/government/publications/fullbrook-mark-chief-of-staff-to-the-prime-minister-no10-a-coba-advice/advice-letter-mark-fullbrook-ceo-fullbrook-strategies>

5. You told the Committee that as Minister for Indo-Pacific at the FCDO:
 - a. you did not meet with Fullbrook Strategies while in office;
 - b. you did not make any policy, regulatory, operational or commercial decisions that were specific to Fullbrook Strategies; and
 - c. you did not have any access to commercial information that could grant Fullbrook Strategies an unfair advantage over its competitors.

Departmental assessment

6. The FCDO provided the following information to the Committee:
 - a. There is no departmental relationship between the FCDO and Fullbrook Strategies.
 - b. You did not have contact with Fullbrook Strategies while in office.
 - c. You did not make any decisions regarding Fullbrook Strategies specifically; though it noted the end clients are unknown.
 - d. Your role involved some involvement in legal cases concerning the National Security and Investment Act (NSIA) and export controls.
 - e. It was not aware of any information of specific relevance, but again noted that the end clients are unknown.
7. The FCDO recommended the standard conditions plus a limitation to your role - that you be precluded from matters related to your involvement in NSIA and export control cases, to prevent any direct overlap with your privileged insight.