

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

Room G/08, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

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

January 2025

BUSINESS APPOINTMENT APPLICATION: The Rt Hon Rishi Sunak MP, former Prime Minister of the United Kingdom. Unpaid appointment with the Hoover Institution, Stanford University.

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 unpaid role you wish to take up with the Hoover Institution, Stanford University (Hoover Institution) as a Distinguished Visiting Fellow and Member of the President's Global Advisory Council.
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 the Hoover Institution. 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. When considering this application, the Committee¹ took into account this appointment, as Distinguished Visiting Fellow and Member of the President's Global Advisory Council, is unpaid.² Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of the government by considering the real and perceived risks associated with former ministers joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risk that individuals may make decisions, or take action, in office in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. The Cabinet Office confirmed you were not involved in policy or commercial decisions specific to the Hoover Institution, nor does it consider you to possess sensitive information that may confer the Hoover Institution an unfair advantage. As the former Prime Minister, there is a risk associated with your network in government and access to information that could provide Hoover Institution with unfair access to the UK government. The unpaid nature of this appointment limits the real and perceived risk of you making improper use of privileged information, contacts or influence gained in office for your personal benefit.

The Committee's advice

7. The Committee considered that the risks in this application can be sufficiently mitigated by the standard conditions below, which seek to prevent you from making improper use of privileged information, contacts and influence to the unfair advantage of the Hoover Institution.
8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Hoover Institution, Stanford University** 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;

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. Baroness Thornton was unavailable.

²By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arms' length bodies on behalf of Hoover Institution, Stanford University (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 Hoover Institution, Stanford University (including parent companies, subsidiaries, partners and clients); and
 - for two years from your last day in ministerial office you should not undertake any work with Hoover Institution, Stanford University (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, the UK government or its arms' length bodies.
9. 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.
 10. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so and we will publish this letter on our website. Any failure to do so may lead to a false assumption being made about whether you had complied with the Rules.
 11. 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.
 12. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website

The Rt Hon Lord Pickles

Annex - Material Information

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.

The role

1. The Hoover Institution, Stanford University is an American public policy academic think tank. Hoover Institution focuses on scholarly and empirical research, offering solutions for policy makers. It does this through scholarship, teaching, publishing, and outreach.
2. You wish to take up a part-time, unpaid role as a Distinguished Visiting Fellow and Member of the President's Global Advisory Council. You stated you will receive a stipend to cover expenses. You stated that you will be contributing to Hoover's research and academic programmes and will be working on Hoover's public policy research. You confirmed that your role will not include contact with the UK government.

Dealings in office

3. You stated that you did not make any policy, regulatory or commercial decisions relating to Hoover Institution whilst in office, nor would you have access to information that would offer Hoover Institution an unfair advantage. You said that Hoover Institution does not have a relationship with No.10, the Cabinet Office.
4. Whilst in office, you stated you met with the Director of the Hoover Institution, Condoleezza Rice.

Departmental assessment

5. The Cabinet Office confirmed the details in your application and recommended the standard conditions.