#### From the Chair



## 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 and Prime Minister. Unpaid appointment with the Council on Foreign Relations.

- 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 with the Council on Foreign Relations (CFR) as a Member on its Global Board of Advisors.
- 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 CFR as the former Foreign Secretary. 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 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 risks that individuals may make decisions or take action in office to 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. There are inherent risks associated with any former minister's access to information, network of contacts and influence in government. It is noted your former department was not aware of any information that would grant the organisation an unfair advantage, and that in your proposed role, you will not have any contact with government.
- 7. The Committee noted that you are returning to the same role, which you held prior to rejoining government.<sup>3</sup>

### The Committee's advice

- 8. The Committee did not consider this appointment raises any particular concerns under the government's Business Appointment Rules. Whilst there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below, preventing you from drawing on your privileged information and using your contacts to the unfair advantage of the CFR, will sufficiently mitigate in this case.
- 9. Therefore, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **Council on Foreign Relations** be subject to the following conditions:

<sup>&</sup>lt;sup>1</sup> This application for advice was considered by Andrew Cumpsty; Hedley Finn OBE; Isabel Doverty; Sarah de Gay; The Rt Hon Lord Eric Pickles; Michael Prescott; The Baroness Thornton and Mike Weir. Dawid Konotey-Ahulu CBE DL was unavailable.

<sup>&</sup>lt;sup>2</sup> By "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.

<sup>&</sup>lt;sup>3</sup> You previously sought advice from ACOBA for the same role following your departure from government in 2010 - the advice letter was sent in May 2017 <a href="https://assets.publishing.service.gov.uk/media/5a750f4640f0b6360e473069/20170504Cameron-CouncilonForeignRelations-Adviceletter.pdf">https://assets.publishing.service.gov.uk/media/5a750f4640f0b6360e473069/20170504Cameron-CouncilonForeignRelations-Adviceletter.pdf</a>

- 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 its arms' length bodies on behalf of the Council on Foreign Relations (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 Council on Foreign Relations (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 Council on Foreign Relations (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.
- 10. 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.<sup>4</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.
- 11. 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.
- 12. You must 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.
- 13. 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

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<sup>&</sup>lt;sup>4</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.

#### **Annex - Material Information**

## The role

- 1. The Council for Foreign (CFR), founded in 1921, is a non-partisan, independent national membership organisation, think tank, educator, and publisher, including of Foreign Affairs journal. It generates policy-relevant ideas and analysis, convenes experts and policymakers, and promotes informed public discussion all to have an impact on the most consequential issues facing the United States and the world.
- 2. You wish to take up a part-time, unpaid role as Member of its Global Board of Advisors. You said the following about the Board and your role:
  - The Board consists of prominent individuals, including business leaders, noted academics, and former government officials from developed and emergingmarket countries.
  - The group is designed to add a vital dimension to CFR's activities by helping bring to CFR's Board and leadership a deeper understanding of international perspectives on global affairs, while also enhancing the dialogue between US leaders in international affairs and their counterparts from other countries.
  - The group has no role in CFR governance
  - You said that this will be a return to a former role for which you got approval from ACOBA in May 2017.
  - You stated that the role will not involve any contact with government.

# Dealings in office

3. You said that you did not make any policy, regulatory or commercial decisions specific to the CFR. You said that there was no known relationship between CFR and your former department, but that in your capacity as Foreign Secretary, you held a meeting with Ambassador Michael Froman at the FCDO, during a visit he made to London to discuss a range of geo-political issues in his role as President of the CFR (and as a former US Trade Representative, and former senior White House / US national security official).

## **Departmental assessment**

4. The FCDO confirmed the details provided in your application and recommended the standard conditions.