



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: George Freeman MP, former Minister of State for Science, Research and Innovation. Paid appointment with Space 4 Earth VC Fund.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as an Advisory Board Member for Space 4 Earth VC Fund (Space 4 Earth).
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 Space 4 Earth, as a former minister. 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. Space 4 Earth is a new investment fund yet to be established. 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 the Minister of State for Science, Research and Innovation at DSIT, you had access to privileged information on scientific, technological and civil space policies. There is some general overlap in this policy area and the proposed focus of this investment fund. For example, you were the minister responsible for the UK Space Agency, which is operated at arm's length from DSIT. However, DSIT was not aware of any specific information you have had access to that would offer an unfair advantage, and it noted that information relating to the challenges and issues facing the civil space sector are now in the public domain. Further, it has been over eleven months since you last had access to information as a minister.
7. There are risks associated with your influence and network of contacts gained in ministerial office. In particular, you may be seen to offer unfair access to a company that may be interested in government policy and decisions relating to the civil space sector. You noted that you have made it clear to the company that you will not lobby government on its behalf, and this will not form part of your role. There is also a risk if your role, in developing Space 4 Earth's business or seeking investors outside of government, were to draw specifically on your contacts in the private sector and foreign governments gained only as a result of your time as a minister.
8. The Committee's consideration also recognised that you have a background in a similar area outside of your time in government and will likely have a network from this experience that you can draw upon.

The Committee's advice

9. The Committee considered the risks associated with your access to information to be limited for the reasons above. The main risks are that you could be seen to make improper use of privileged contacts. The conditions below adequately mitigate the risks. They seek to prevent you from making use of privileged information, contacts and your influence to the company's unfair advantage.
10. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **Space 4 Earth VC Fund** be subject to the following conditions:

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; The Baroness Thornton and Mike Weir.

- 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 any of its arm's length bodies on behalf of Space 4 Earth VC Fund (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial office to influence policy, secure business/funding or otherwise unfairly advantage Space 4 Earth VC Fund (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 Space 4 Earth VC Fund (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 in office in other governments and organisations for the purpose of securing business or investment opportunities for Space 4 Earth VC Fund.
11. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; there are separate 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 Parliament you have a separate ban on paid lobbying under the Parliamentary 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.

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

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. 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. You said that Space 4 Earth is a new private entity and venture capital fund, with the investment and advisory board based in the UK. You said that Space 4 Earth plans to focus on investing in space-related technologies which promote:
 - Efficient and sustainable food production
 - Clean water
 - Decarbonisation
 - The end to deforestationYou said it does not have a relationship with government.

2. You said that you wish to take up a paid, part-time role as an Advisory Board Member (Science, Innovation and Technology) for Space 4 Earth. You said that this role will involve:
 - visibility as a board member (e.g. a photograph and bio for the brochure)
 - one 90 min meeting every other month (virtual)
 - one in person meeting per year
 - advising on fundraising and investment to senior Space 4 Earth staff as and when appropriate.You said that you have made it clear to Space 4 Earth that you cannot, and are not willing to, lobby government on its behalf.

3. You said you considered this as returning to a former career in which you worked for 15 years prior to becoming an MP and then a minister. You said your previous work focused on science and technology consulting, corporate finance advisory, and investing. You worked for the Cambridge Cluster³ from 1996 to 2010, founding and financing high growth technology companies and promoted industries in biology and life sciences. You said that Space 4 Earth is seeking to raise funds from private investors to support high growth companies developing space applications for sustainability. You hope to bring your professional experience of venture fundraising and investment to this role.

Dealings in office

4. You said that you did not meet with Space 4 Earth whilst in office. You said that you did not make any policy or regulatory decisions specific to Space 4 Earth whilst in office. You said as minister responsible for the UK Space

³ <https://www.cambridgenetwork.co.uk/the-network/cambridge-cluster>

Agency, you made the decision for the UK to reassociate with Copernicus,⁴ the EU's Earth observation programme, following Brexit. This decision is likely to have been seen positively by the sector GSpace 4 Earth operates in, as it operates in the civil space sector.

Departmental assessment

5. DSIT confirmed that you did not meet with Space 4 Earth whilst in office. DSIT said that you did not make any policy, regulatory or commercial decisions specific to Space 4 Earth whilst in office. It considered the risks regarding your access to information are limited - it was not aware of any information you have that would offer it an unfair advantage. DSIT noted that information relating to the challenges and issues facing the civil space sector are in the public domain.
 6. DSIT recommended standard conditions.
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⁴ <https://climate.copernicus.eu/>