



**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>

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**BUSINESS APPOINTMENT APPLICATION: The Rt Hon Robert Halfon, former Minister of State for Skills, Apprenticeships and Higher Education for the Department for Education. Paid appointment with Metaverse Learning Limited.**

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 Advisor to the Board of Directors for Metaverse Learning Limited (Metaverse Learning).
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 Metaverse Learning, as a former minister at the Department for Education (DfE). 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. You did not make any policy, regulatory or commercial decisions specific to Metaverse Learning whilst in office. Your only interactions with the company were limited to attendance at wider stakeholder events. The DfE noted that whilst it does not have an ongoing relationship with Metaverse Learning, it has previously invited the company to tender, alongside other companies. It was never awarded a contract. The Committee<sup>1</sup> therefore considered that the risk that this role could be seen as a reward for your decisions in office is low.
6. As a minister at the Department for Education (DfE), you had access to privileged information on the further education sector and skills development. DfE noted that you had access to some information through your membership of the Green Jobs Delivery group, but this is limited and relevant to the green jobs sector - not the EdTech sector. Further, much of this information is in the public domain and you are unlikely to know which direction the new government will take in this area. It has been over seven months since you last had access to information as a minister.
7. There are risks associated with your influence and network of contacts gained whilst in ministerial office. In particular, part of your role with Metaverse Learning involves networking on behalf of the company. It is important that you and Metaverse Learning have confirmed there will be no lobbying of government in this role. You will also have contacts outside of government within other governments and educational institutions gained during your time in office. It would be improper for you to draw on your privileged network for the unfair advantage of Metaverse Learning when seeking to develop its business.

## The Committee's advice

8. The Committee considered the risks associated with your access to information to be limited for the reasons above.
9. The conditions below prevent you from lobbying government, making use of privileged information and from working on any bids or contracts the company might have, or seek to have, with government. Additionally in this case, the Committee would draw your attention to the additional restriction that makes it clear you should not use any contacts you may have developed during your

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

time in office in other governments and other organisations outside of the UK government when seeking business for Metaverse Learning.

10. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **Metaverse Learning Limited** 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 UK government or any of its arm's length bodies on behalf of Metaverse Learning Limited (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 Metaverse Learning Limited (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to on behalf of Metaverse Learning 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 your last day in ministerial office, you should not become personally involved in lobbying contacts you have developed during your time in office in other governments and organisations for the purpose of securing business for Metaverse Learning Limited.

11. 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>2</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.

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<sup>2</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.

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.
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(s), 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. Metaverse is a company that provides immersive education technology using recent developments such as AI and virtual reality to support education. It is used across many education sectors, including higher education. Metaverse works with a range of clients and partners with its clients to provide suitable AI platforms- one of whom is the Department for Business and Trade. The Department for Education (DfE) is also listed as a partner on its website.
2. You wish to take up a part-time, paid role as an Advisor to the Board of Directors for Metaverse Learning. You said your role would be to:
  - Provide strategic advice and guidance on key business decisions;
  - Attend quarterly board meetings (in-person/virtually) to offer insights and feedback;

- Participate in discussions and planning sessions regarding opportunities to build awareness and usage;
- Collaborate with other board members and leadership to shape the company's future direction;
- Attend key events as ambassador of the company providing advocacy and on some occasions speaking and networking as its representative.
- You said the role will not involve any contact with government and Metaverse Learning has confirmed that your role will not include lobbying.

### Dealings in office

3. You said that you did not make any policy, regulatory or commercial decisions specific to Metaverse Learning in office.
4. You said that you did not meet with Metaverse Learning in office, nor does your former department have a particular relationship with the company. However, you said the CEO of Metaverse Learning, Jason Holt, has other roles within the apprenticeships and FE sector and you would have come into contact at events. You said you may have met him directly related to apprenticeships and FE, but not related to Metaverse Learning or any form of EdTech. You have known Jason Holt for a number of years.

### Departmental assessment

5. DfE was consulted in relation to this application. It provided the following information:
  - Metaverse Learning lists DfE as a partner on its website; however, DfE said that this is not a description that the department recognises.
  - DfE invited Metaverse Learning to tender on three occasions but nothing came of this.
  - Metaverse was in attendance at a 'Skills for Growth' event in June 2023 at the invitation of the organisation World Skills at which you were also present.
  - You met Metaverse Learning's CEO Jason Holt in his capacity as CEO of the Association of Apprentices on 29<sup>th</sup> November 2023 and for a breakfast on 14<sup>th</sup> December 2022 - not in relation to Metaverse Learning.
  - You did not make any policy or regulatory decisions specific to Metaverse Learning, though you made decisions relating to the HE/FE sectors as a whole.
  - You were a member of the Green Jobs Delivery Group (GJDG).<sup>3</sup> Whilst

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<sup>3</sup> <https://www.gov.uk/government/groups/green-jobs-delivery-group> - this has the list of members, publications and current tasks.

some information on the work is already available publicly, it generated some policy options that were never published, due to the General Election. You were privy to discussion of these options and were briefed on and influenced DfE's work on them.<sup>4</sup>

- Your access to policy information still in flux is limited (to the Green Jobs Delivery Group) and not considered sensitive enough to offer an unfair advantage, and also noted neither DfE, nor you, know what direction the policy will take under the new government.
- There has been a time gap since you left office (7 months).

6. DfE recommended standard conditions be imposed on this appointment.

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<sup>4</sup> For example, in the GJDG Summer 2023 Statement:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1175156/green-jobs-delivery-group-summer-2023-statement.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1175156/green-jobs-delivery-group-summer-2023-statement.pdf)