



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Steve Baker FRSA, former Minister of State at the Northern Ireland Office and Cabinet Office. Paid work via Globelynx.

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 paid work as an Expert Panel Member via Globelynx, part of the PA Media Group.
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 Globelynx. 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. As a minister, you spoke with media outlets whilst in office, including the PA Media Group. The Committee¹ noted you did not meet with nor have any official dealings with Globelynx in office, and therefore the risk this role could reasonably be seen as a reward for decisions made, or actions taken, in office is low.
6. This advice provides you consent only for media roles that come as a result of you joining Globelynx, subject to a number of conditions. You must seek advice in relation to any roles that come as a result of this work that can be considered longer term appointments, so that the risks can be assessed and it will need to be demonstrated by you and your former departments that the work would be appropriate under the Rules.

The Committee's advice

7. The Committee did not consider this appointment raises any particular concerns under the government's Rules. The risk associated with your access to information is limited given the nature of this role. You stated you will be joining a platform, in which you may be working with other broadcasters as a result of it. It is an individual's responsibility to manage the propriety of the specific pieces of work undertaken. In particular, as the former Minister of State at the Northern Ireland Office and Cabinet Office, you must be careful not to offer any unfair insight as a result of your access to information and potential influence in government - which the conditions below seek to mitigate.
8. The standard conditions below appropriately mitigate the risks associated with drawing on privileged information and making improper use of contacts and influence within government to the unfair advantage of Globelynx.
9. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Globelynx** 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 its arm's length bodies on behalf of Globelynx (including parent companies, subsidiaries, partners

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

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 Globelynx (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 Globelynx (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 arm's 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' Interests². 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.
11. 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 Ministerial Code or otherwise.
12. The Business Appointment Rules explain that the restriction on lobbying means that you "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".
13. 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.

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.

14. Once the appointment(s) 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. According to its website, Globelynx is a global platform, focused on elevating brands by facilitating press requests and connecting experts with journalists and broadcasters. It is a part of the PA Media Group.
2. You stated you will not be paid by Globelynx, but you being on this platform may lead to other broadcasters booking you, thereby providing remuneration.
3. In your role as Expert Panel Member, you stated you will be commenting on politics and public policy. Globelynx will promote you to broadcasters, increasing your profile, and provide access to the PA Media Group newswire. You stated that ordinarily experts pay to be on the platform and broadcasters do not pay a fee. You stated you are being offered the opportunity to be on the platform to help encourage its use with the potential for remuneration in the long term.
4. You confirmed your role will not involve contact with government.

Dealings in office

5. You advised the Committee that you were not involved in regulatory, policy or commercial decisions specific to Globelynx.

Departmental Assessment

6. The Northern Ireland Office confirmed the details you provided and:
 - a. you were not involved in decisions specific to Globelynx and/or PA Media Group;
 - b. you gave interviews to PA Media Group during your time in office;
 - c. the department has a commercial relationship with PA Media Group to receive its news coverage; and
 - d. it did not have concerns relating to your access to sensitive information.

7. The Northern Ireland Office did not have concerns with the proposed appointment and recommended the standard conditions.