

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. Unpaid role with Alzheimer's Research UK.

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 an unpaid role as President of Alzheimer's Research UK (ARUK).
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 ARUK. The material information taken into consideration by the Committee is set out in the annex below.
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 President 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 government by considering the real and perceived risks associated with former Crown servants 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, 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. ARUK is a charity focused on research for treatment, diagnosis and prevention for dementia. As President, you said that your role would be ambassadorial in nature: advocating for ARUK, supporting fundraising, and relationship-building. You said that your role would involve contact with government. This could involve attendance at events where ministers will also attend, and engagement with ministers about Alzheimer's and ARUK.
7. As a former Cabinet Minister, there are real and perceived risks associated with your access to information in ministerial office. This is limited due to the lack of overlap between this role and your ministerial responsibilities, and the fact that you have been out of office for over six months.
8. It is significant that you held this role prior to entering government as Foreign Secretary. Your proposed contact with government in this role is in keeping with the lobbying ban imposed on all former ministers for two years on leaving office. However, you must be careful to avoid contact that may reasonably be perceived as seeking to influence government decisions. This would not prevent others within the organisation from engaging in such activity.

The Committee's advice

9. The Committee considered that this appointment does not raise any particular propriety concerns under the government's Rules. The risks are appropriately mitigated by the standard conditions below, and further limited by the unpaid nature of this role. These prevent you from drawing on privileged information, contacts and influence within government to the unfair advantage of ARUK.

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 Pickles; Michael Prescott; Baroness Thornton; and Mike Weir.

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.

10. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Alzheimer's Research UK** be subject to the following conditions:

- a three-month waiting period from your last day in office - now passed;
- 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 Alzheimer's Research UK (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 Alzheimer's Research UK (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 Alzheimer's Research UK (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.

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.³ You are reminded that as a Member of the House of Lords you are prevented from any paid lobbying under the House of Lords 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.

³ 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(s), or if it is announced that you will do so. 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.
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. Alzheimer's Research UK (ARUK) is the UK's leading dementia research charity, working to revolutionise the way dementia is treated, diagnosed and prevented. The charity focuses on funding the highest quality, collaborative and international-facing research, using investment to fill gaps and speed progress for people with dementia.
2. You informed the Committee you wish to take up an unpaid, part-time role as President. You provided the following information about your role:
 - a. ARUK's President is the charity's highest-level Ambassador, having shown long-standing commitment to the charity and dementia research as a whole.
 - b. Working closely alongside the charity's leadership team and senior volunteers to accelerate progress towards a cure, the President will offer support to the organisation as needed, with activity primarily focused on:
 - i. Advocacy and raising awareness of dementia and the work of ARUK;
 - ii. Supporting fundraising activity
 - iii. helping to build strategic collaboration opportunities for ARUK
 - iv. Helping to drive and cement ARUK's work as a thought leader in the dementia research field.
 - c. The President will support ARUK's mission: to accelerate progress towards a cure for the diseases that cause dementia.
 - d. All activity will be aligned with the charity's strategic objective, centred around improving the treatment, diagnosis and prevention of dementia.
3. You said there is a possibility of involvement in ARUK events at which ministers will attend, or engagements with ministers about Alzheimer's.
4. You told the Committee that this is a role you held previously, from 2017 to 2023, having had this engagement approved by ACOBA previously in 2017. On returning to government service in November 2023, your association with ARUK as a Patron was also declared to the Permanent Secretary at the FCDO and to the Prime Minister's Independent Adviser on Ministerial Interests, and was included on your entry in the Ministerial Register of Interests.

Dealings in office

5. Beyond your role as a Patron, you said that you did not meet with, nor make any decisions specific to ARUK as Secretary of State for the Foreign, Commonwealth, and Development Office (FCDO).

Department Assessment

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