



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Penny Mordaunt, former Leader of the House of Commons and Lord President of the Council. Paid appointment with Do Not Look Away.

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 producing and appearing in a series of short films about Ukraine, produced by Do Not Look Away.
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 Do Not Look Away 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. Do Not Look Away is a video production company. You seek to produce and appear in a series of short films for social media, which will portray the positive aspects of Ukraine and its hopes for after the war.

6. The Cabinet Office confirmed that you made no policy, regulatory, commercial or operational decisions in office that were specific to Do Not Look Away; and that you had no contact with the company while in office. Therefore, the Committee¹ considered the risk that you could be seen to have been offered this role as a reward for decisions made or actions taken in office, was low.
7. As a former minister, there are inherent risks associated with your privileged access to information and contacts which may be seen to be of general use to any company. The risk associated with your access to information is limited given the transparent and public nature of this role. You told the Committee that this role will not have any contact with government.

The Committee's advice

8. The Committee did not consider that your role as being the subject of a documentary show with Do Not Look Away raises any propriety concerns under the government's Rules, provided it is subject to the conditions below.
9. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Do Not Look Away** be subject to the following conditions:
 - A three month waiting period from your last day in ministerial office;
 - 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 Do Not Look Away (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 Do Not Look Away (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 Do Not Look Away (including parent companies, subsidiaries, partners and clients) that involves providing advice on the terms of, or with

¹ This application for advice was considered by Andrew Cumpsty; Hedley Finn OBE; Sarah de Gay; Dawid Konotay-Ahulu OBE DL; The Rt Hon Lord Eric Pickles; Michael Prescott; and Mike Weir. Isabel Doverty was absent.

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' Interests.² 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 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".
13. 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.
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

² 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. Do Not Look Away is a video production company, registered on Companies House and incorporated in 2024. You stated that:
 - a. You would be providing assistance for, and producing a series of short films to convey positive aspects of Ukraine and their hopes post war.
 - b. You will also appear in some of the videos.
 - c. These will be posted on social media.
 - d. You were approached directly for this role.
 - e. You have deep connections to the country.
 - f. The role is paid and part-time.
 - g. You will not have contact with government as part of this work.

Dealings in office

2. You advised the Committee that you were not involved in policy, regulatory, operational or commercial decisions specific to Do Not Look Away, nor did you have access to sensitive information specific to the company during your time in office.

Departmental Assessment

3. The Cabinet Office was consulted for this application. It confirmed the details you provided in your application, and did not have any concerns with this appointment. The standard conditions were recommended.