

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Baroness Vere of Norbiton, former Parliamentary Secretary at HM Treasury and prior to that, Parliamentary Under Secretary of State at the Department for Transport. Paid appointment with Altitude Angel Ltd.

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 with Altitude Angel.
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 Altitude Angel. 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. Altitude Angel is a provider of drone and UAV solutions. It has a stakeholder relationship with the Department for Transport (DfT). There is no known overlap with your time at HM Treasury, though there is an overlap with your previous role at DfT. As Aviation minister, you met with Altitude Angel alongside DfT officials, to be briefed on its business. Further, as Co-Chair of the Future of Flight Industry Group,¹ you met with Altitude Angel and other key stakeholders in the aviation industry in delivering the eventual Future of Flight action plan² - designed to accelerate the growth of Future of Flight and relevant technologies³ safely and securely in the UK.
6. DfT confirmed that you were not responsible for decisions relating to the Future of Flight Industry Group. Further, the Future of Flight action plan was carried out by your successor. Both of these positions are in the public domain. DfT and HM Treasury confirmed that you were not involved in any policy, regulatory or commercial decisions specific to Altitude Angel. Further, as an aviation company, it is regulated by the Civil Aviation Authority (CAA), which sits at arm's length from the department, and is without influence from your individual decisions. As such, Committee⁴ considered that the risk this appointment can be considered a reward for decisions or actions taken in post, was low.
7. As the former minister with responsibility for the aviation sector in which Altitude Angel operates, you would have had access to information that could be perceived to benefit the company. HM Treasury and DfT considered your access to information in relation to relevant policy raised no specific risk. DfT confirmed that the majority of information of specific relevance was in the public domain, and that the change of government reduced the currency of any policy information you may possess. Further, it has been eleven months since you left the department, providing a gap between your access to information and taking up this appointment.
8. As with any former minister, there are risks associated with your contacts and influence within government and the potential for Altitude Angel to gain unfair access or influence as a result. The Committee considered it significant that you confirmed your role as Advisory Board Member excludes any dealings with government – reducing the risk that you could be perceived to be lobbying government – which all former ministers are prevented from doing for two years after leaving office.

¹ <https://www.gov.uk/government/groups/future-of-flight-industry-group>

² <https://www.gov.uk/government/publications/future-of-flight-action-plan>

³ Including but not limited to, electric sub-regional aircraft, advanced air mobility vehicles and drones.

⁴ This application for advice was considered by Isabel Doverty; Sarah de Gay; Hedley Finn OBE; Dawid Konotey-Ahulu CBE DL; The Rt Hon Lord Pickles; Michael Prescott; and The Baroness Thornton. Mike Weir and Andrew Cumpsty were unavailable.

The Committee's advice

9. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information, contacts or influence gained from your time in ministerial service to the unfair advantage of Altitude Angel.
10. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Altitude Angel Ltd** 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 Altitude Angel Ltd (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 Altitude Angel Ltd (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office you should not undertake any work with Altitude Angel Ltd (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.⁵ 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

⁵ 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.

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.

13. 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”.
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 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 stated Altitude Angel is a leading provider of drone and UAV solutions, offering airspace management, navigating data. According to its website, Altitude Angel delivers solutions which enable the safe integration and use of drones and UAVs into international airspace. Altitude Angel has a stakeholder relationship to government - the company had previously been selected by government to represent the UK at the World of Drones & Robotics Congress in August 2021 in Brisbane, Australia.⁶
2. In your (paid) role as Advisory Board Member, you described your responsibilities below:
 - Provide strategic advice and guidance on the Company's direction and guidance.
 - Attending and actively participating in Advisory Board meetings.
 - Offering insights based on her experience to help the Company to navigate challenges and seize opportunities.
 - Assisting in the development and review of strategic plans and initiatives.
 - Acting as an ambassador for the Company within your network and company.
3. You confirmed your role will not involve contact with, or the lobbying of government.

Dealings in office

4. You stated in your dealings with Altitude Angel:
 - You met two members of the Altitude Angel's senior management team at their request on one occasion, alongside DfT officials, to be briefed on its business in April 2023.
 - You Co-Chaired the Future of Flight Industry Group with government and key stakeholders in the aviation industry, including Altitude Angel - for the building of an eventual Future of Flight action plan. You stated your last interaction with the company was in September 2023 and you did not oversee the decisions or plan that came as a result and the information related is in the public domain.
 - You stated no decisions came as a result of these interactions.

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<https://www.altitudeangel.com/news/uk-government-select-altitude-angel-to-represent-team-gb-at-world-of-drones-robotics-congress>

5. You stated you were not involved in any policy, commercial or regulatory decisions, nor had access to sensitive information specific to Altitude Angel. You added that any commercially sensitive information that you might have had access to is unlikely to still be relevant given the passage of time, the specifically relevant information being in the public domain and the fast-moving nature of the sector. You also stated that since you left DfT, there has been a change in Government, whose priorities will differ and into which you will have no insight.

Departmental assessment

6. HM Treasury confirmed you were not involved in any decisions specific to Altitude Angel, nor did the department have concerns relating to your access to sensitive information of relevance.
7. DfT confirmed the statements above from yourself are an accurate reflection of your interaction with Altitude Angel during your time as Aviation minister, and:
 - You were not involved in decisions specific to Altitude Angel; and
 - It did not have concerns regarding your access to sensitive information, with any policy knowledge you would have been privy to would be out of date due to the change in government.
8. HM Treasury and DfT did not have concerns with the appointment and recommended the standard conditions.