



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Lord Sharpe of Epsom OBE, former Parliamentary Under Secretary of State at the Home Office. Unpaid appointment with Africa House London.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) on an unpaid role you want to take up with Africa House London.
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 you had access to. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's¹ 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

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

5. When considering this application, the Committee took into account this appointment as a Non-Executive Director is unpaid. 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 the government by considering the real and perceived risks associated with former ministers 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. You had no dealings with Africa House London in Office and there is no direct overlap with your responsibilities in office and this role. There are inherent risks associated with any former minister's access to information, network of contacts and influence in government. In this case there is also a broad overlap between the policy work of Africa House London and your role at the Home Office.

The Committee's advice

7. The Committee did not consider this appointment raises any particular concerns under the government's Business Appointment Rules. Whilst there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below, preventing you from drawing on your privileged information and using your contacts to the unfair advantage of Africa House London, will sufficiently mitigate the risks in this case.
8. Therefore, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Africa House London 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 its arm's length bodies on behalf of Africa House London 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

Africa House London Limited (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 Africa House London Limited (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 arms' length bodies.
9. 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.
 10. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so and we will publish this letter on our website. 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.
 11. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

The Rt Hon Lord Pickles

Annex - Material Information

The role

1. Africa House London is a non-profit UK trade and investment agency. It was established to encourage direct investment and trade with key markets in the Middle East and Africa and their governments, in addition to promoting sustainable job creation opportunities, growth and long-term prosperity for Middle Eastern, African and UK businesses. The website states it is a social enterprise.

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.

2. You wish to take up a part-time, unpaid role as a Non-Executive Director. The role will be as an Advisory Board Member, where you said you hope to make use of your '*global network of business contacts to help Africa House on its mission*'. You worked in investment banking prior to joining government.

Dealings in office

3. The Home Office said that your only official dealings you had in office that related to Africa was during an inward visit from a Nigerian Delegation looking at Fraud engagement, when you said a few words only. You did not make decisions specific to the organisation nor do you have access to particular privileged information.
4. The Home Office confirmed no overlap with Africa House London during your time in office, and noted only a very small number of contributions within the House of Lords on the Middle East, Africa and trade.

Departmental Assessment

5. The Home Office confirmed the details provided in your application and recommended the standard conditions.