



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Chris Philp MP, former Minister for Police, Crime and Fire, the Home Office. Paid appointment in his capacity as a shareholder with Pluto Partners LLP, trading as Pluto Finance.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) on your role as Advisor with Pluto Partners LLP (Pluto Finance).
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 you made during your time in office, alongside the information and influence a former minister may offer Pluto Finance. 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 Rules¹ set out that former minister must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

¹ Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code.

The Committee's consideration of the risks presented

5. You co-founded Pluto Finance 15 years ago, prior to becoming MP, and retain shares in the company. You have now been asked to return to the company to provide ad hoc advice on its business strategy and performance. The company provides bridging, development and investment finance for property developers and investors in the UK. It is part-owned by the Universities Superannuation Scheme, the UK's largest private sector pension scheme.
6. During your time as minister, you did not meet with in an official capacity, nor have any involvement in decisions specific to Pluto Finance. The Committee² considered the risk this appointment could reasonably be perceived as a reward for decisions made, or actions taken in office, is low.
7. Given the range of ministerial positions you have held across various departments, you will have had access to sensitive information that could benefit any organisation, including Pluto Finance. The Home Office, nor HMT is aware of any sensitive information you had access to. It has been four months since you left office, there is no direct overlap with your access to information. It has also been over 2 years since your short time as a minister at HMT.
8. As with any former minister, there are inherent risks associated with your contacts and influence within government and the potential for Pluto Finance to gain unfair access or influence as a result. The Committee considered it significant that you said your role will exclude any dealings with government, reducing the risk you could be perceived to be lobbying government - which all former ministers are prevented from doing for two years after leaving office.
9. There is a risk, or perception thereof, that you could make improper use of contacts made outside of government during your time as a minister to gain business. This is considering that your role, as described, may include occasional assistance with developing the business for the company.
10. It is significant that you previously worked in the real estate sector and are returning to the company you founded 15 years ago, prior to becoming MP.

² This application for advice was considered by Andrew Cumpsty; Hedley Finn OBE; Sarah de Gay; The Rt Hon Lord Pickles; Michael Prescott; and Mike Weir.

The Committee's advice

11. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of information or influence gained from your time in ministerial service to the unfair advantage of Pluto Finance.
12. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Pluto Partners LLP** 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 Pluto Partners LLP (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 Pluto Partners LLP (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office, you should not provide advice to Pluto Partners LLP 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; and,
 - for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you have developed during your time in office and in other governments and organisations for the purpose of securing business for any company or organisation (including parent companies, subsidiaries and partners).
13. 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' Interests³. 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.

³ 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.

14. 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.
15. 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".
16. You must inform us as soon as you take up employment with this organisation, 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.
17. 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 co-founded Pluto Finance 15 years ago, prior to becoming MP. You said you are still a shareholder and have been asked to return to provide advice on a part-time, ad hoc basis
2. According to its website, Pluto Finance is part-owned by the Universities Superannuation Scheme and is a provider of finance for UK property developers and investors. It is a principal lender, not an intermediary, which is supported by a range of investors including pension funds, insurers and large global financial institutions.
3. As an Advisor, you stated that you will give advice and assistance on an informal basis. This will include:
 - providing strategic business advice;

- reviewing and commenting on performance; and
 - business development
4. You confirmed that your role will not involve contact with, or lobbying of, government.

Dealings in office

5. You stated that you did not have any contact with Pluto Finance in an official capacity during your time in office and that there is no relationship between Pluto Finance and your former departments. You added that you were not involved in regulatory, policy or commercial decisions, nor did you possess any privileged information specific to Pluto Finance.

Departmental assessment

6. Your former departments, the Home Office and HMT, were consulted on this application. They confirmed the above information and provided the following information:
- You did not make any regulatory or policy decisions that would have affected Pluto Finance. HMT confirmed that you were recused from relevant advice and decision-making involving the Department for Levelling Up, Housing and Communities spending on:
 - housing
 - planning
 - building safety policy
- and related policy areas including:
- mortgage policy
 - financial products for first-time buyers
 - taxation of property and property development
 - Landlord tax and DWP spending/policy on housing benefit.
 - You did not meet with Pluto Finance in an official capacity.
 - There is no relationship between Pluto Finance and your former departments.
 - You did not have access to privileged information that could confer an unfair insight/advantage to the proposed employer.
 - You did not make any funding or contractual/commercial decisions that affected Pluto Finance.
7. The departments recommended standard conditions.