



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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The Rt Hon Pat McFadden MP  
Chancellor of the Duchy of Lancaster and  
Minister for Intergovernmental Relations

31 March 2025

Dear The Rt Hon Pat McFadden MP

I am writing to you in my capacity as Chair of the Advisory Committee on Business Appointments (ACOBA) regarding a failure to follow the government's Business Appointment Rules (the Rules) by Rebecca Pow. This is outlined in the correspondence enclosed.

The Committee is independent, with a remit to consider applications received under the Rules, consider the risks and advise on the conditions that should apply.

The Business Appointment Rules (the Rules) are set by the government, with the policy owned by the Cabinet Office. The requirement for former ministers to seek and abide by ACOBA's advice is set out clearly in the Ministerial Code, including specifically that: '*...Former Ministers must ensure that no new appointments are announced, or taken up, before the Committee has been able to provide its advice.*'

Ms Pow acknowledged her mistake and that she should have sought advice before taking up the post, and apologised. Failure to secure advice in this case is a breach of the government's Rules.

The Ministerial Code and government's Rules are clear that an application for advice is required for all outside roles, irrespective of potential limitation in the risk. The risks are significantly limited in unpaid cases due to the lack of financial gain to the individual. What action you take is a matter for the government. However, given the unpaid nature of the role and its low risk, the Committee considers that further government action in this case would be disproportionate.

It is the Committee's policy to act transparently, including making public any failure to follow the Rules that it is made aware of – correspondence on this matter will be published on our website.

A handwritten signature in black ink, appearing to read "Lord Pickles". The signature is written in a cursive, slightly stylized font.

**The Rt. Hon Lord Pickles**

Copied to:

The Rt Hon Nick Thomas-Symonds MP, Minister for the Cabinet Office;  
Darren Tierney Director General, Propriety and Ethics, Cabinet Office;  
Rebecca Pow.

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**Enclosures:**

- ACOBA's final letter to Rebecca Pow
- Correspondence from Rebecca Pow in response to ACOBA