



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

31st March 2025

Dear The Rt Hon Pat McFadden MP,

I write 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 Ruth Edwards. Please see the relevant correspondence included in the annex.

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 Edwards accepted that she prematurely announced her role by setting up a public website and updating her LinkedIn profile - prior to receiving advice from ACOBA. Failure to wait for advice was a breach of the government's Rules.

The purpose of the Rules is to protect the integrity of government by considering the real and perceived risks associated with former ministers joining outside organisations. This has not been possible here. The government owns both the Rules and their enforcement. It is now a matter for government to decide what the appropriate action to take.

In line with the Committee's policy of transparency, correspondence on this matter will be published on our website.



The Rt. Hon Lord Pickles

Annex - Correspondence with Ruth Edwards

Dear Ms Edwards,

Re: Application for advice on the role of, 10 Years Ahead

I am writing to you in my capacity as Chair of the Advisory Committee on Business Appointments (ACOBA). I have been alerted to the announcement on your LinkedIn profile and the publication of the company website about the formation of 10 Years Ahead. This announcement was made before receiving ACOBA's advice on the appointment.

The requirement to seek and abide by ACOBA's advice is set out clearly in the Ministerial Code¹, 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*'. The government's Business Appointment Rules (the Rules) exist to protect the integrity of government. Applicants have a personal responsibility to understand and comply with the Rules and to manage the propriety of appointments taken up after leaving government service.

You accept that in setting up a public website and updating your LinkedIn profile - you have made your proposed work with 10 Years Ahead public prior to receiving advice from ACOBA. You confirmed to ACOBA that you are not working with clients, but your public profile leaves you open to criticism for starting this work without following the Rules. Failure to wait for advice was a breach of the government's Rules.

The purpose of the Rules is to protect the integrity of government by considering the real and perceived risks associated with former ministers joining outside organisations. This is not possible to do so credibly when the role is already in the public domain. ACOBA will not be providing advice in this case. It is ACOBA's policy to report breaches of the Rules to government, and in line with our policy of transparency, we will publish our correspondence in due course. I note that you have responded in writing to accept the breach. We will include this correspondence in our publication and report to government.

¹ www.gov.uk/government/publications/ministerial-code/ministerial-code

I remind you to seek and await final advice for any new appointment or employment you plan to take up within two years of leaving office.



The Rt Hon Lord Pickles

Annex - Letter of 21 March 2025 from Ruth Edwards to head of ACOBA.

Dear Dominic and Catriona,

Thank you for your time on the phone today where we discussed my application to ACOBA and your concerns that my LinkedIn profile and the development of a business website could be seen as a breach of ACOBA's rules around the timings of any public announcement of a new role.

As we discussed on the call, I had no intention of not following the guidance and I have not taken on any client work whilst waiting for ACOBA's advice.

However, given the long period of time that has been taken over deciding my application, I recently started some preparatory work, updating my LinkedIn and publishing material on the business website, so that I could approach potential clients once ACOBA's guidance is issued.

Unlike entering into employment for an established business, there is a lot of work that a new business needs to do to become 'client ready'. If this can't be done until a decision has been taken and that decision takes months, then I do think the timeframe for deciding applications around self-employment needs to be reviewed.

The timeframe I was given for a decision from ACOBA, was six weeks. I submitted my application on the 6th January and it is now the 20th March, meaning my application has been awaiting a decision for nearly two and half months.

From our conversation, I appreciate that ACOBA has been short staffed and that you had to wait longer than usual for information to be sent to you by the Cabinet Office. However, the end result for the applicant, whatever the cause of the delay, is a

prolonged period where they are unable to earn a salary. For most people this is difficult and for some it isn't feasible.

I'm sorry to hear that ACOBA is unlikely to provide advice on my application. I think the record will show that I engaged in the process in good faith and I do feel that the long decision period has put me in a rather invidious position.

Of course, I understand that ACOBA has to make decisions within the framework of the existing rules. I do ask however that, should a breach report be sent to the Government, this letter is sent with it. It is important that ministers understand the impact that the current rules have on applicants, they will, of course, be the people affected by them after the next election.

Lastly, I would like to thank you and the other members of the ACOBA team I have spoken to over the last couple of months. I'm sure it has been a very busy time for you and your team have always been very helpful.

With best wishes,

Ruth