

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

February 2025

BUSINESS APPOINTMENT APPLICATION: The Rt Hon Chloe Smith MP, former Secretary of State for the Department of Science, Innovation, and Technology. Paid appointment with Ulin Group.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as an Advisory Board Member for Ulin Group.
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 Ulin Group, as a former minister. 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. Your former department, the Department for Science, Innovation and Technology (DSIT), had no contractual relationships with Ulin Group. While you

were the Secretary of State responsible for decisions at the Department for Science, Innovation and technology, you made no policy, regulatory or commercial decisions specific to Ulin Group. Therefore, the Committee¹ considered that the risk that this role could be seen as a reward for your decisions in office is low.

6. There is a general overlap between your role as Secretary of State for Science, Innovation and Technology and your proposed role with Ulin Group given that one of the sectors Ulin Group advises on is technology. As such, there is a risk related to your access to sensitive information. There are factors that significantly limit the real and perceived risk that the information you possess could provide Ulin Group an unfair advantage:
 - you were at the department for only three months covering maternity leave;
 - there is now a different administration in place and DSIT confirmed the direction of policy is changing;
 - you have now been out of office for 19 months, creating a significant gap between your access to information and your role with Ulin Group.
7. Given that Ulin Group's clients and the precise pieces of work that you will undertake are unknown, there is also a risk related to a potential overlap with your time in office.
8. You told the Committee that it is not your intention to have contact with government in this role, nor lobby on the behalf of Ulin Group or its clients.

The Committee's advice

9. The Committee considered the risks associated with your access to information to be limited for the reasons above. To address the risk associated with Ulin Group's unknown clients, the Committee has imposed a further condition as is standard in such cases. This makes it clear, you should not advise on work with regard to any policy you had material involvement in or responsibility for in your recent time as Secretary of State for Science, Innovation and Technology.
10. The remaining conditions below prevent you from making improper use of privileged information, contacts and your influence to the company's unfair advantage.

¹ This application for advice was considered by; Hedley Finn OBE ; Dawid Konotey-Ahulu CBE DL; The Rt Hon Lord Eric Pickles; Michael Prescott; The Baroness Thornton and Mike Weir.

11. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **Ulin Group** 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 any of its arm's length bodies on behalf of Ulin Group (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 Ulin Group (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to or on behalf of Ulin Group (including parent companies, subsidiaries, partners and clients) 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 any of its arm's length bodies; and
- for two years since your last day in office, you should not advise Ulin Group or its clients on any work with regard to any policy decisions which you had a material role in developing or determining, or where you had a relationship with the relevant client during your time as Secretary of State for Science, Innovation and Technology.

12. 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.

13. 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

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.

also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Civil Service Code or otherwise.

14. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/minister *'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.'*
15. You must inform us as soon as you take up employment with this organisation(s), 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.
16. 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. Ulin Group are a business consulting and services firm focussed on 4 main areas:
 - Environmental sustainability: green funding, supply chain, ESG & product solutioning
 - Technology transformation: future-proofing strategies & governance for AI, digitisation & cyber
 - Workforce resilience: managing socio-demographic, psychological & physical workplace factors
 - Geo-strategic resilience: leveraging international trade & diplomacy, mitigating crime, war & extremism
2. You wish to take up a paid part-time role as an advisory board member for Ulin Group. You described the role as providing strategic advice to the CEO and acting as a fractional (i.e. part-time) CEO, Chair, Board member or otherwise interim role on demand to Ulin's clients. You confirmed that the role will not include advice on the subject matter or terms of a bid to the UK government; and does not engage at a relevant level with areas for which you had responsibility in government within the last two years.

Dealings in office

3. You said that you did not meet with Ulin Group during your time in government. You said you did not have any involvement in policy, regulatory or commercial decisions that would have been specific to the company.

Departmental Assessment

4. DSIT said that as Secretary of State you were exposed to making regular policy and regulatory decisions which affected many companies though it is unlikely that any decisions affected Ulin Group directly.
5. DSIT said that you had access to privileged material relating to the areas the department covers including AI and technology which is a sector that Ulin advises on. However, they said there was no specific evidence that this information will offer an unfair advantage considering the role in question. DSIT said that your role at the department was time-limited to 3 months (19 months ago) and that since this time the direction of policy has changed.
6. DSIT recommended the standard conditions