



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>

January 2025

BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: The Rt Hon Chloe Smith MP, former Secretary of State for Science, Innovation and Technology at the Department of Science, Innovation, and Technology. Paid appointment with Silence Speaks.

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 Chair for Silence Speaks.
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 Silence Speaks, 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. As Secretary of State for Science, Innovation, and Technology for a limited period of three months, you had responsibility for AI and technology. During this time you did not meet with, nor were you involved in policy, regulatory or commercial decisions that specifically affected Silence Speaks during your time in office. 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 at the Department for Science, Innovation and Technology (DSIT) and your proposed role with Silence Speaks given Silence Speaks is an AI platform. As such, there is a risk related to your access to sensitive information. However, there are mitigating factors that limit the real and perceived risk that the information you possess could provide an unfair advantage:
 - you were at the department for only three months covering maternity leave;
 - you have now been out of office for 18 months, creating a significant gap between your access to information and your role with Silence Speaks;
 - policy matters that you worked on have now been published in the AI white paper²;
 - there is now a different administration in place and the direction of policy is changing.
7. As with any former minister, there are inherent risks associated with your contacts and influence within government and the potential for Silence Speaks to gain unfair access or influence as a result. You note that the company is likely to have some contact with the government. Further, that you are cognisant of the lobbying ban that applies to all former ministers for two years from leaving office - which prevents you from seeking to influence government on behalf of Silence Speaks.

The Committee's advice

8. The Committee considered the risks associated with your access to information to be limited for the reasons above. The Committee considered the risks can be appropriately mitigated by the standard conditions below. These seek to prevent Silence Speaks gaining an unfair advantage as a result

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

² <https://www.gov.uk/government/publications/ai-regulation-a-pro-innovation-approach/white-paper>

of your privileged access to information, contacts and influence whilst in government.

9. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **Silence Speaks** 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 Silence Speaks (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 Silence Speaks (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 Silence Speaks (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
10. 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.³ 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.
11. 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 Civil Service Code or otherwise.

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.

12. 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."*
13. 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.
14. 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. Silence Speaks is an AI platform that translates sign language into text and vice-versa to enable easier social interactions for hearing/speech impaired.
2. You wish to take up a paid, part-time role as Chair with Silence Speaks. You were approached by the CEO in Dec 2024. You said your core responsibilities within this role are as follows:

Strategic leadership:

- Collaborate with the CEO and executive team to define and refine the company's long-term vision, strategic goals, and operational priorities.
- Lead the board in providing direction and oversight on key business initiatives, particularly those that support scaling the platform and expanding accessibility for the deaf community.
- Drive innovation and help the company maintain a competitive edge in the

rapidly evolving tech and accessibility spaces

Governance and oversight:

- Lead and chair board meetings, ensuring that the board is functioning effectively and that decisions are made in a timely and well-informed manner.
- Ensure adherence to best practices in corporate governance, compliance, and ethical standards.
- Foster a culture of transparency, accountability, and inclusivity within the board and throughout the organisation.

Advocacy and community engagement:

- Represent Silence Speaks in key external forums, including partnerships with government bodies, advocacy groups, and organisations focused on disability rights and inclusion.
- Champion the needs of the deaf community by staying informed about trends, challenges, and opportunities in the accessibility and sign language space.
- Support the development of initiatives and partnerships that align with Silence Speaks's mission and expand its impact within the deaf and hard-of-hearing communities.

Financial stewardship:

- Oversee the financial health of the company by ensuring effective financial control and supporting fundraising efforts for scaling operations.
- Provide strategic oversight for fundraising, investor relations, and the allocation of resources to achieve key objectives.
- Work with the CEO and CFO to monitor financial performance, risk management and sustainability.

Team development and mentorship:

- Work closely with the CEO to ensure the effective development and succession planning of the leadership team.
- Mentor senior leadership, offering advice and insight based on experience, to help develop the next generation of leaders within the company.
- Ensure that the company maintains a positive and inclusive corporate culture that reflects its values and mission

3. You said that whilst you are subject to the government's Business Appointment Rules (and ACOBA's advice) you would not use contacts,

influence policy nor secure business for Silence Speaks. You stated that during this period you will not engage with government at a relevant level for areas for which you had responsibility in your role as Secretary of State at DSIT.

Dealings in office

4. You said that you did not make any decisions specific to Silence Speaks in office, nor did you meet with the company. You said that although you were responsible for AI policy, your access to information was limited because:
 - You were in post under time-limited circumstances to provide maternity cover.
 - It was agreed that you would leave a number of key decisions for the return of the permanent Secretary of State and you left post before an update was decided upon, drafted and published in the form of the AI White Paper⁴.
 - Your responsibilities in office were at 'extremely strategic levels' and your proposed role with Silence Speaks is at a different, applied level. For example, you said your decisions on AI focused on global safety and cross-government risks rather than application within organisations - as would apply here in this role.
 - A new government is now in office and changing significant elements of policy on AI, including changing spending plans and proceeding with primary legislation.

Departmental assessment

5. DSIT stated that as Secretary of State you were exposed to policy and regulatory decisions which affected many companies. However, in relation to this specific case:
 - These decisions did not directly or specifically affect Silent Speaks.
 - Your role was time-limited for a period of three months.
 - Eighteen months have passed since you were working at DSIT and relevant information from your time in office is now in the public domain.
 - DSIT stated that they do not have an interest in this company and their goals
 - There is now a new administration in place and the direction of policy has changed.
6. DSIT recommended standard conditions.

⁴ <https://www.gov.uk/government/publications/ai-regulation-a-pro-innovation-approach/white-paper>

