

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Viscount Camrose, former Parliamentary Under Secretary of State (Minister for Artificial Intelligence and Intellectual Property) in the Department for Science, Innovation and Technology. Paid commission with Conquer Technology Ltd under your independent consultancy (Camrose Management Ltd).

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) on taking up a commission with Conquer Technology Ltd (Conquer Technology) under your independent consultancy, Camrose Management Ltd.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions you made during your time in office, alongside the information and influence you may offer your potential clients. 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. The Committee¹ considered this commission to be broadly consistent with the description of your consultancy – offering technology advisory and business development services.
6. There is no relationship between Conquer Technology and your former department – the Department for Science, Innovation and Technology (DSIT) – and you did not meet with, nor were you involved in any decisions specific to Conquer Technology whilst you were in office. Therefore, the Committee considered there is limited risk that this commission can reasonably be perceived as a reward for decisions made in office.
7. The Committee recognised that as the Minister for Artificial Intelligence and Intellectual Property, you had access to information that could overlap with this work. This risk is limited given your former department is not aware of anything specific to Conquer Technology and it has been seven months since you were in office. Additionally, DSIT's view is that matters will have moved on as a result of the time that has passed, decisions made and a change in government. Therefore, your former department considered any access to information you had is now unlikely to offer an unfair advantage.
8. The Committee agrees with DSIT that there still remains a risk, in part because it is unknown which clients and work you will advise on. Consequently, there is a possibility you could be asked to work with clients you previously had a relationship with while in office, or on issues for which you had specific responsibility. This situation could lead to a risk of providing Conquer Technologies with an unfair advantage.
9. Given your time as the former Minister for Artificial Intelligence and Intellectual Property, there is a risk that your network and influence within government may offer, or be seen to, unfairly advantage to Conquer Technology. As your commission with Conquer Technology involves business development, there is a risk that any contacts you may have developed whilst in office could be used to gain business for the company.

The Committee's advice

10. In the circumstances, the Committee considered the majority of the risk under the Rules can be mitigated by the conditions that apply to your independent consultancy, Camrose Management Ltd.

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

11. In addition, a further restriction limiting your role with Conquer Technology has been imposed. As Conquer Technology clients are unknown, the Committee needs to mitigate the risk associated with that – as risks are most likely to arise were you to advise on matters that materially overlap with your responsibilities as Secretary of State for DSIT.
12. To mitigate the remaining unknown risk that Conquer Technology's own work or clients may overlap with your responsibilities in office, the Committee has imposed an additional restriction to prevent you from advising on work you were materially involved in during your time in office. It is significant that Conquer Technology has provided written confirmation that it will ensure compliance with the conditions set out in this letter.
13. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this commission with **Conquer Technology Ltd**, should be subject to the same conditions applied to your independent consultancy, Camrose Management Ltd:
- you should not draw on (disclose for 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 Conquer Technology Ltd (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 contacts to influence policy, secure business/funding or otherwise unfairly advantage Conquer Technology Ltd (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 Conquer Technology Ltd (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;
 - for two years since your last day in ministerial service, you should not become personally involved in lobbying contacts you developed during your time in office in other governments and organisations for the purpose of securing business for Conquer Technology Ltd; and

- for two years from your last day in ministerial office, before accepting any commissions for Camrose Management Ltd and or/before extending or otherwise changing the nature of your commissions, you should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.

In addition, the Committee has imposed the following condition on this work with Conquer Technology Ltd:

- for two years since your last day in office, you should not advise Conquer Technology Ltd or its clients on any work with regard to any policy or regulatory 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 Parliamentary Under Secretary of State for DSIT.

14. 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' Interests². You are reminded that as a Member of the House of Lords you are prevented from any paid lobbying under the House of Lords Code of Conduct. 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.

15. 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.

16. 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*

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.

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’.

17. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so. Please 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.
18. 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 stated that Conquer Technology is a new organisation, working in software development.
2. You stated this is a paid commission under Camrose Management Ltd. You said you will be advising Conquer Technology on:
 - business strategy
 - tech strategy
 - business development

Dealings in office

3. You told the Committee that you were not involved in decisions, nor had access to sensitive information specific to Conquer Technology.
4. You stated as Minister for Artificial Intelligence and Intellectual Property, you:
 - had extensive dealings with the tech sector. This included tech businesses of all sizes, operating in both hardware and software.
 - you also met regularly with industry bodies and arms’ length bodies (Tech UK, Alan Turing Institute etc.) All such meetings were attended and minuted by civil servants in DSIT.

Correspondence with Conquer Technology

5. Conquer Technology confirmed in writing its understanding of, and agreement to, comply with the Committee's advice. The CEO provided the following in writing:

'Thank you for your email regarding Viscount Camrose's application to provide consultancy services to Conquer Technology via his independent consultancy, Camrose Management.'

We confirm that we understand and will fully comply with the conditions set out under the Business Appointment Rules. Specifically, we acknowledge the restriction that Viscount Camrose must not advise Conquer Technology or any of its clients on matters relating to policy or regulatory decisions in which he had a material role during his time at DSIT, or where he had a relationship with the relevant client.

To ensure compliance, we will implement the following measures:

- *Viscount Camrose's engagement will be clearly scoped to exclude any work connected to policy or regulatory matters he was involved in during his time in government.*
- *Any potential projects or clients will be reviewed by senior management to ensure there is no overlap with his previous government role or relationships.*
- *Should any uncertainty arise regarding a potential conflict, the matter will be referred back to ACOBA for further guidance.*

We are happy to provide any additional information if required. Please let me know if you need anything further.'

Departmental assessment

6. DSIT confirmed the details in your application, including that you made no decisions specific to the company.
7. DSIT noted that it was likely that very little of the information or decisions that you were aware of as minister are likely to be relevant now, given how much time has passed and the change in government.
8. DSIT did not have concerns with this work and recommended the standard conditions apply.