

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>

January 2025

BUSINESS APPOINTMENT APPLICATION: The Viscount Camrose, former Parliamentary Under Secretary of State (Minister for Artificial Intelligence and Intellectual Property) in the Department for Science, Innovation and Technology. Application to establish a consultancy operating as 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) to establish a consultancy operating as 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

5. In your application, you said your consultancy will involve offering technology advisory and business development services.
6. It would not be improper for you to operate a consultancy which draws on generic skills and experience you gained from your time in government. The risks in this case are hard to quantify given the potentially broad and wide-ranging nature of the consultancy; and you had access to a wide range of sensitive information and insight whilst in office. The Committee¹ considered you could offer a potential unfair advantage over competitors – whether in relation to seeking new clients, or in providing them with advice.
7. The Committee recognised there is an overlap with the work you did as the Minister for Artificial Intelligence and Intellectual Property – therefore you had access to information and were involved in decisions on such matters. It is significant that your former department, the Department for Science, Innovation and Technology (DSIT) confirmed that all decisions you were involved in during your time as a minister are now in the public domain. Further, ongoing matters you had knowledge of, such as Artificial Intelligence (AI) regulation, have moved on significantly since you left office over six months ago – also when you last had access to information. DSIT does not consider that you possess any specific information or insight that could offer your future clients an unfair advantage.
8. Given the overlap with your work as a minister and the work you plan to carry out, there is a risk your time in office may be seen to have offered you access to contacts that could be used to gain business for your consultancy.
9. This advice provides you consent only to set up a consultancy, subject to a number of conditions. It does not give you consent in relation to any possible future clients. You must seek advice in relation to each client, so that risks can be assessed, and it will need to be demonstrated by you and DSIT that the work would be appropriate under the Rules.

Future Commissions

10. You must seek advice from the Committee for each commission you wish to accept. Whether the conditions set out below can sufficiently mitigate the risk presented by any future commission you propose to take up will depend on the specific details of each piece of work. Any failure to seek advice before accepting work would be a breach of the Rules and treated as such – including reporting breaching to government.

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

11. The risks under the Rules will be most significant where you seek to provide advice on matters where you made decisions or had access to sensitive information in office – these applications will need close scrutiny. The Committee will want to carefully consider the suitability of this work, and may advise that a further waiting period is required. Where conditions and a suitable waiting period cannot appropriately mitigate the risks, the Committee may advise the work is unsuitable to take up within the two years the Rules apply. The Committee will consider such risks on a case-by-case basis.
12. All potential clients must be notified of this advice, and when seeking work/new clients, you must adhere to the conditions below. Under the government's Business Appointment Rules, the Committee advises that this **Independent Consultancy operating as Camrose Management Ltd** should be subject to the conditions set out below:
- 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 those you advise under Camrose Management Ltd (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage those you advise under Camrose Management 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 those you advise under Camrose Management 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 from your last day in ministerial office, you should not become personally involved in lobbying contacts you developed during your time in office and in other governments and organisations for the purpose of securing business for Camrose Management 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.

13. 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 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.
14. 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.
15. 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 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'*.
16. 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.
17. 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

² All Peers and Members of Parliament are prevented from paid lobbying under the the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your 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.

Annex – Material Information

Independent Consultancy

1. You said that Camrose Management Ltd offers technology advisory and business development services. You confirmed that you will not take on work which involves contact with, or lobbying government.

Dealings in office

2. 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.

Departmental assessment

3. DSIT provided its views on Camrose Management Ltd:
 - you were not involved in policy decisions including on regulation that related to tech in your ministerial portfolio that were specific to Camrose Management Ltd.
 - decisions you were involved in now are in the public domain and remaining matters that were not official policy at the time of the election are now superseded by new advice and decisions by the current government.
 - the current government has publicly set out its intentions or direction of policy thinking on AI regulation following the General Election. For example, confirming its plans to legislate on frontier AI^{3,4} and the recently launched consultation on copyright and AI⁵. It added that you were not involved in decisions on the technology sector as a whole, as this would have fallen to the Minister for Tech and Digital Economy.
 - you were not involved in commercial or funding decisions specific to Camrose Management Ltd, though the department noted you would have made some commercially sensitive decisions – for example, on requests for substantial consultancy spend in the department. In your portfolio, you will have seen some commercially sensitive advice that related to your portfolio only, not to the technology sector as whole,

³ <https://questions-statements.parliament.uk/written-statements/detail/2024-07-26/HLWS24>

⁴ <https://researchbriefings.files.parliament.uk/documents/LLN-2024-0040/LLN-2024-0040.pdf>

⁵ <https://www.gov.uk/government/consultations/copyright-and-artificial-intelligence>

such as the AI Safety Institute working with private companies to review their frontier models.

- your dealings with the tech sector were confirmed broadly as you noted.
- you do not possess sensitive information that may confer an unfair advantage to Camrose Management Ltd or its clients.

4. DSIT did not have concerns with the establishment of Camrose Management Ltd and recommended the standard conditions that apply for an independent consultancy.