



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Anneliese Dodds MP, former Minister for Development at the Foreign, Commonwealth and Development Office, and former Minister for Women and Equalities at the Department for Education. Unpaid appointment with Königswinter.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) seeking advice on taking up an unpaid role as a Committee Member for Königswinter.
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 Königswinter. The material information taken into consideration by the Committee is set out in the annex below.
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. When considering this application, the Committee¹ took into account this appointment as a Committee Member at Königswinter is unpaid². Generally, the Committee's experience is that the risks related to unpaid roles are limited. 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. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions, or take action in office, in expectation of rewards on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. There is no direct overlap between your ministerial responsibilities and your role with Königswinter as a Committee member. There remain inherent risks associated with any former minister's access to information, network of contacts and influence in government. In this unpaid role, these risks are limited.
7. Under the Rules, as a former Minister for Development at the Foreign, Commonwealth and Development Office who attended Cabinet, you are subject to a minimum waiting period of three months between leaving office and taking up an outside role.

The Committee's advice

8. The Committee did not consider this unpaid appointment to raise any particular concerns under the government's Business Appointment Rules. The standard conditions below sufficiently mitigate the inherent risks. These seek to prevent you from making improper use of privileged information, contacts and influence to the unfair advantage of the organisation.
9. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Königswinter** be subject to the following conditions:
 - a waiting period of three months from your last day in office;

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

² By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

- 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 its arm's length bodies on behalf of Königswinter (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 to influence policy, secure business/funding or otherwise unfairly advantage Königswinter (including parent companies, subsidiaries, partners and clients); and
 - for two years from your last day in ministerial office you should not undertake any work with Königswinter (including parent companies, subsidiaries, partners and clients) that involves providing advice 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 its arm's length bodies.
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' Interests³. You are reminded that as a Member of Parliament you have a separate ban on paid lobbying under the Parliamentary 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.
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 Ministerial Code or otherwise.
12. 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*

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 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.

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, or if it is announced that you will do so and we will publish this letter on our website. You must 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.

Isabel Doherty

Interim Chair

ACOB

Annex – Material Information

The role

1. The Königswinter Conference was established in 1950 with the aim of improving the troubled relationship between Germany and the UK. It brings together German and British politicians, diplomats, business managers, academics and journalists to improve the understanding of policy differences on topical issues and challenges and to work towards common approaches. Issues discussed have included security policy, European integration, the future of the welfare state, education policy and the integration of ethnic minorities to international economic policy. The Königswinter Conference is organised jointly by the Deutsch-Britische Gesellschaft and its British counterpart, UK Koenigswinter.
2. You wish to take up a part-time, unpaid role as a Committee Member of Königswinter's British committee, UK Koenigswinter. You stated you will be supporting around three conferences a year – a general conference, one focused on economic policy, and another on security and defence policy.
3. You said you will have no formal contact with government in your role, but by attending the conferences, you may meet officials and ministers from your former department. You noted it would be the role of the Chair and administrators to directly contact government regarding the timing of conferences and whether key ministers can attend - you will not be involved in this.
4. You confirmed that prior to your role as a minister, you were a member of the UK Koenigswinter committee and previously served as director of Königswinter.

Dealings in office

5. You noted the association receives funding from the FCDO and from private companies and foundations. You said that you did not make any policy, regulatory or commercial decisions specific to Königswinter, and that you did not have any access to information that could grant Königswinter an unfair advantage.

Departmental assessment

6. Your former departments, the FCDO and DfE confirmed you were not involved in any regulatory or policy decisions that could unfairly advantage

Königswinter; nor did you have access to privileged information that could be considered to offer an unfair advantage to Königswinter.

7. The FCDO noted that the Deputy Head of Mission in the British Embassy Berlin sits on the steering committee for Königswinter. FCDO also highlighted that it makes an annual financial contribution to the running of the event. DfE confirmed it has no departmental relationship with Königswinter.
8. The FCDO stated that as a minister, you spoke at the most recent conference in November 2024 representing the UK government and the FCDO. Your participation was organised with and through FCDO officials.
9. Both departments recommended this unpaid appointment be subject to the standard conditions.