

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: The Rt Hon Penny Mordaunt, former Leader of the House of Commons and Lord President of the Council. Unpaid appointment with the Coalition for Global Prosperity.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) an unpaid role as Chair of the Coalition for Global Prosperity.
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 the Coalition for Global Prosperity. 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 advice

5. When considering this application, the Committee¹ took into account this appointment is unpaid.² 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 the 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 to 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. You did not meet with, nor did you make any policy, regulatory or commercial decisions specific to the Coalition for Global Prosperity - further limiting the possible risk this role could be seen as a reward for decisions made in office.
7. As a former Cabinet minister, you will have had access to a range of information that could benefit any organisation - though there is nothing specifically identified that would offer an unfair advantage here. That you have been out of office for three months, and the unpaid nature of this appointment, limits the real and perceived risk of you making improper use of information you had access to while in office for your personal benefit.
8. As a former minister you are subject to the lobbying ban that applies for two years standard under government's Rules. You must be careful to adhere to this when contacting Members of Parliament who are also government ministers as described in your application.

The Committee's advice

9. The Committee did not consider this appointment raises any particular propriety concerns under the government's Business Appointment Rules. There are inherent risks associated with your time as a minister. The standard conditions below, which prevent you from drawing on your privileged information and using your contacts to the unfair advantage of the organisation, will sufficiently mitigate the risks in this case.
10. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **Coalition for Global Prosperity** be subject to the following conditions:

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

²By 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 the Coalition for Global Prosperity (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 the Coalition for Global Prosperity (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 the Coalition for Global Prosperity (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.
11. 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.
12. 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. Any failure to do so may lead to a false assumption being made about whether you had complied with the Rules.
13. 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.
14. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

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.

Annex - Material Information

The role

1. The Coalition for Global Prosperity is an Non Governmental Organisation funded by philanthropic foundations to educate and inform. The website states that its mission is to *'....bring together political, military, business and faith leaders who believe that an effective development budget, alongside an active diplomatic and defence strategy, keeps Britain at the forefront of saving lives, alleviating poverty and bringing freedom, security and prosperity to those who need it most.'*
2. The Coalition is mainly funded by:
 - a. Grants: from organisations such as Ciff, the Bill and Melinda Gates Foundation, the Children's Investment Fund Foundation, the Eleanor Crook Foundation.
 - b. Individuals: including Bill Gates, Gordon Brown, Theresa May, Jonathan Sacks, and Lenny Henry.
3. In your unpaid, part-time role as a Chair of the Board, your role will involve chairing meetings and holding the executive team to account.
4. You said that your role will not involve any lobbying of government, but will involve contact with ministers and parliamentarians, in their capacity as MPs, as the organisation facilitates educational visits for MPs. You said that this will likely include FCDO ministers.
5. To describe these visits, the organisation's website states: *'In partnership with different NGOs, CGP's cross-party Overseas Visits Programme takes UK parliamentarians to see the far-reaching and transformative impact of UK development projects around the world.'*

Dealings in office

6. You provided the Committee with the following information:
 - a. You did not make any policy, regulatory or commercial decision specific to the Coalition for Global Prosperity.
 - b. You did not have access to any sensitive information that could grant the organisation an unfair advantage.
 - c. You previously worked with the Coalition for Global Prosperity in your

capacity as Secretary of State for International Development (from 9 November 2017 to 1 May 2019). You said that this was not a contractual relationship, rather your department and the Coalition had the same platform to promote the UK's work.

Departmental Assessment

7. The Cabinet Office confirmed the details in your application and recommended the standard conditions.