



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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April 2025

BUSINESS APPOINTMENT APPLICATION: Rebecca Pow, former Parliamentary Under Secretary of State at the Department for Environment, Food and Rural Affairs. Unpaid appointment with CHASE Africa.

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 Ambassador for CHASE Africa (CHASE).
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 CHASE. 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 an Ambassador to CHASE 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 specific overlap between your ministerial responsibilities and your proposed role with CHASE. There are inherent risks associated with any former minister's access to information, network of contacts and influence in government.

The Committee's advice

7. The Committee did not consider this appointment to raise any particular concerns under the government's Business Appointment Rules. The inherent risks in this application can be sufficiently mitigated by the standard conditions below, which seek to prevent you from making improper use of privileged information, contacts and influence to the unfair advantage of the organisation.
8. Therefore, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **CHASE Africa** 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 its arm's length bodies on behalf of CHASE Africa (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

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

business/funding or otherwise unfairly advantage CHASE Africa (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 CHASE Africa (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.
9. 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. 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.
10. 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.
11. 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'*.
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. 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.

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.

Isabel Doherty

Interim Chair
ACOB

Annex – Material Information

The role

1. CHASE Africa (CHASE) is a charity based in the UK that supports communities in East Africa (Kenya, Uganda and Tanzania) through various local partnerships and projects – aiming to improve education, healthcare, and access to clean water and sustainable farming practices. It primarily relies on donations, grants, and fundraising from individuals and corporations for its funding. It also receives government funding from the Global Health Workforce Programme from the Department of Health and Social Care (DHSC). You noted that you had no involvement in this - you were not a DHSC minister.
2. You wish to take up a part-time, unpaid role as an Ambassador. You said that your role would be to assist in promoting the work of CHASE by highlighting their programmes and the partners it engages with, including both funders and potential funders - though not the UK government. You also stated that you will support the charity's messaging on empowering women and girls, improving health, and addressing family planning barriers - while emphasising the benefits and importance of an integrated approach linked to environmental and conservation activities.
3. You said CHASE may periodically apply for government funding, but you will not be involved in this; nor will you have contact with the UK government in this proposed role.

Dealings in office

4. You said that you did not make any policy, regulatory or commercial decisions specific to CHASE, that you did not have any access to information that could grant CHASE an unfair advantage, and that there was no relationship between CHASE and Defra. You noted CHASE has received funding from the Department for Health and Social Care, in which you had no involvement.
5. You noted that outside of your ministerial responsibilities, in a personal capacity, you received updates about CHASE from the founder of the charity at your request.

Departmental assessment

6. Defra confirmed the details provided in your application, including that you made no decisions specific to CHASE, nor did you have access to information that would offer the CHASE an unfair advantage.
7. Defra recommended this unpaid appointment be subject to the standard conditions.