



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>

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Steve Baker, former Minister of State for Northern Ireland and Minister of State in the Cabinet Office. Paid appointment with Glint Pay.

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 paid appointment with Glint Pay.
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 a former minister may offer Glint Pay. 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. There is no direct overlap with your responsibilities in ministerial office and this role. You did not meet with Glint Pay, nor did you make any decisions specific to the company whilst in office. Therefore, the Committee¹ considered

¹ This application for advice was considered by; Isabel Doverty; Hedley Finn OBE; Sarah de Gay; The Baroness Thornton and Michael Prescott.

the risk this commission could reasonably be perceived as a reward for decisions or actions taken in office is low.

6. As a former minister, there are inherent risks associated with your access to privileged information, contacts and influence within government. The risks are limited given your former departments confirmed they are not aware of any privileged information you had access to that may offer Glint Pay an unfair advantage, you have been out of office for ten months and you confirmed your proposed role would not involve contact with government.

The Committee's advice

7. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information, contacts or influence gained from your time in ministerial office to the unfair advantage of Glint Pay.
8. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Glint Pay** 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 Glint Pay (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 Glint Pay (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office you should not undertake any work with Glint Pay (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; and
 - for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you have developed during your time in office and in other governments and organisations for the purpose of securing business and/or investment opportunities for Glint Pay (including parent companies, subsidiaries and partners).

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' Interests.² 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 Civil Service Code or otherwise.
11. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/minister *'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 this role, or if it is announced that you will do so. You must also 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.
13. 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.

Isabel Doverty

Interim Chair

ACOPA

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.

Annex - Material Information

The role

1. Glint Pay is an electronic payment card, app, and account linked to gold (the precious metal). Glint's website states it has enabled gold to be used as everyday money all over the world via electronic payments. Money in a Glint account is linked to physical gold with users having direct and legal ownership over gold held in Switzerland. You wish to take up a part time role as Business Development Affiliate. You said that your role would be to provide support and assistance in business development including but not limited to the following:
 - Social media
 - Videos in support of marketing campaigns
 - Participation in podcasts and other media for and on behalf of the company as required
 - Attendance at meetings as required
 - Endorsements in marketing material as required.

Dealings in office

2. You said that you did not make any decisions specific to Glint Pay in office, nor did you meet with the company.

Departmental assessment

3. The Northern Ireland Office (NIO) and the Cabinet Office confirmed the details you provided in your application and confirmed that you have no access to privileged information that could unfairly advantage Glint Pay.
4. NIO and the Cabinet Office proposed standard conditions.