



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

Room G/08, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)

Website: <http://www.gov.uk/acoba>

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**BUSINESS APPOINTMENT APPLICATION: Baroness Gray of Tottenham CBE, former Chief of Staff, Prime Minister's Office. Unpaid appointment with Queen's University Belfast.**

1. Baroness Gray sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Crown Servants (the Rules) on an unpaid role she wishes to take up with Queen's University Belfast as Pro-Chancellor.
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 Baroness Gray's time in office, alongside the information and influence she may offer Queen's University Belfast. 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 Rules<sup>1</sup> set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants 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

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<sup>1</sup> Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code.

5. When considering this application, the Committee<sup>2</sup> took into account that this appointment is unpaid<sup>3</sup>. 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 Crown servants 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. During her time in office, Baroness Gray would have been invited to attend public events being organised and run by Queen's University Belfast. She also noted that in her role as Pro-Chancellor, she may have some contact with the government at events she attends. Whilst this is not contrary to the Rules, to comply with the lobbying ban, it must not be of a nature that could reasonably be perceived as lobbying the UK government on Queen's University Belfast's behalf.
7. There remain inherent risks associated with any former Crown servant's access to information, network of contacts and influence in government. In this unpaid role, these risks are limited.

#### 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 Baroness Gray 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 that this appointment with **Queen's University Belfast** be subject to the following conditions:
  - Baroness Gray should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time in Crown service;

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<sup>2</sup> This application for advice was considered by Isabel Doherty; Hedley Finn OBE; Sarah de Gay; Dawid Konotey-Ahulu CBE DL; and Michael Prescott. The Baroness Thornton was recused.

<sup>3</sup> 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.

- for two years from her last day in Crown service, she should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of Queen's University Belfast (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Queen's University Belfast (including parent companies, subsidiaries, partners and clients); and
- for two years from her last day in Crown service, she should not undertake any work with Queen's University Belfast (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 the applicant's 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<sup>4</sup>. The applicant is reminded that, as a Member of the House of Lords, she is 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.
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/Civil Service Code or otherwise.
12. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant '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.'

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<sup>4</sup> 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 Commissioner for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

13. Baroness Gray must inform us as soon as she takes up this role, or if it is announced that she will do so, and we will publish this letter on our website. She must also inform us if she proposes to extend or otherwise change the nature of her role as, depending on the circumstances, it may be necessary for her to make a fresh application.

Yours sincerely,

Murray Hemley  
**Committee Secretariat**

## **Annex – Material Information**

### The role

1. Queen's University Belfast is a public research university located in Belfast, Northern Ireland. Established in 1845 as Queen's College, it is a member of the Russell Group universities, as well as the Association of Commonwealth Universities, the European University Association, Universities UK and Universities Ireland.
2. Baroness Gray wishes to take up a part-time, unpaid role as Pro-Chancellor. She told the Committee that key responsibilities of her role will likely include:
  - being called upon to provide a sounding board for the Chair;
  - acting as an intermediary with other members of Senate as may be required;
  - potentially playing a role in supporting and advising the Chair should there be significant differences of views within the governing body; and
  - chairing both the Planning, Finance and Resources Committee and the Remuneration Committee.

Additional responsibilities will include:

- acting as an ambassador for the University, promoting its activities in the wider community and be invited to represent the University at a range of events, both internal and external;
  - undertaking duties as specified by the University Statutes and Regulations;
  - attending training and induction as required in carrying out the role of Pro-Chancellor and as a Member of Senate; and
  - attending selected university graduation ceremonies at which she may be required to deputise for the Chancellor in presiding over the conferment of degree awards.
3. Baroness Gray stated that it is likely that she will interact with individuals in HMG as part of wider events she attends / plans to attend.

### Dealings in office

4. Baroness Gray said that she did not make any policy, regulatory or commercial decisions specific to Queen's University Belfast, and that she did not have any access to information that could grant Queen's University Belfast an unfair advantage.

### Departmental assessment

5. The Cabinet Office confirmed Baroness Gray did not make any policy, regulatory or commercial decisions specific to Queen's University Belfast

during her time in office.

6. The Cabinet Office stated that Baroness Gray may have been exposed to privileged information relating to the wider higher education sector. However, such information is likely to be significantly outdated prior to her starting in her new role; and is unlikely to be specific enough to be of any advantage to Queen's University Belfast.
7. The Cabinet Office also noted that Queen's University Belfast has engaged with consultant lobbyists, specifically iNHouse Communications Limited in 2020. The university is also affiliated with representative bodies like Universities UK, which also use consultant lobbying services.
8. The Cabinet Office recommended the following conditions:
  - a restriction from lobbying UK government officials on behalf of her prospective employer for 2 years following their final day in service;
  - a restriction on Baroness Gray advising or working on a bid on behalf of their employer on any contracts and funding bids from the UK Government during her role for two years from her last day in service;
  - a reminder of her ongoing duties in respect of confidentiality of information gained as a result of their time as a Crown Servant;
  - a reminder that if she is to contact officials of the UK government, that this should be done via official channels; and
  - the standard SCS4 waiting period of three months from Baroness Gray's last day in service (which has now elapsed).