

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Ben Wallace MP, former Secretary of State for Defence at the Ministry of Defence. Unpaid appointment with the British Hound Sport Association.

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 an unpaid role you want to take up as a Committee Member of the British Hound Sport Association (BHSA).
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 BHSA. 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

5. When considering this application, the Committee¹ took into account that this appointment as a Committee Member of the British Hound Sport Association 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. The Ministry of Defence (MOD) informed the Committee that:
- You did not meet with the BHSA in office.
 - You would have been aware of hunting licences being issued to hunters/hunting organisations to hunt on MOD estates. As the Secretary of State, you would not have had involvement in awarding these licences because the Defence Infrastructure Organisation is responsible for considering and issuing licences on behalf of the Secretary of State for Defence.
 - You were involved in a decision to terminate a Memorandum of Understanding with the League Against Cruel Sports regarding providing information about hunting on MOD estates. The MOD said this decision could be perceived to have benefitted any pro-hunting organisations, including but not specifically the BHSA, but considered the risks associated with the decision are limited.

The Committee's advice

7. The Committee did not consider this appointment raises any particular propriety concerns under the Rules. Whilst there are inherent risks associated with your access to sensitive information, contacts, and decisions made in office, the standard conditions below, which prevent you from drawing on your privileged information, contacts and influence to the unfair advantage of BHSA, will sufficiently mitigate the risks in this case.
8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **British Hound Sport Association** be subject to the following conditions:

¹This application for advice was considered by Andrew Cumpsty; Hedley Finn OBE; Sarah de Gay; The Rt Hon Baroness Jones of Whitchurch; Dawid Konotey-Ahulu CBE; The Rt Hon Lord Eric Pickles; and Mike Weir. Isabel Doherty was unavailable. Michael Prescott was recused.

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 arms' length bodies on behalf of the British Hound Sport Association (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 British Hound Sport Association (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 British Hound Sport Association (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 arms' 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' Interests.³ 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.
10. 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.

³ All Peers and Members of Parliament are prevented from paid lobbying under the 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.

11. 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.
12. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

The Rt Hon Lord Pickles

Annex - Material information

The role

1. You said the BHSA is the governing body for all of the Hound Sports Associations. Its aim is to promote and support the welfare and conservation of all hound breeds, and infrastructure of the recognised hunts.
2. The BHSA provides support, guidance and supervision for all recognised hunts and individual hunt personnel, and is responsible for training programmes.
3. You said your role as a Committee Member is unpaid and part-time. Your responsibilities will include approving initiatives and advising on strategy. It will not involve contact with government.

Dealings in office

4. You advised the Committee you did not meet with, nor make any decisions or have access to sensitive information specific to the BHSA.

Departmental Assessment

5. The MOD confirmed the details you provided and added that:
 - You would have been aware of hunting licences being issued to hunters/hunting organisations on Ministry of Defence (MOD) estates. It said you would not have had involvement in awarding the licences because the Defence Infrastructure Organisation is responsible for considering and issuing licences on behalf of the Secretary of State.
 - You were involved in a decision to terminate a Memorandum of Understanding with the League Against Cruel Sports regarding providing information about hunting on MOD estates. It said the above decision could be perceived to have benefitted pro-hunting organisations such as BHSA, but said the risks associated with the decision are limited because the appointment is unpaid.
 - You did not have contact with the BHSA during your time as Secretary of State for Defence; and
 - The MOD does not have a relationship with the BHSA. Hunters/Hunting organisations can apply for a licence to hunt on MOD estates through the Defence Infrastructure Organisation.
6. The MOD did not have any concern with the appointment and recommended the standard conditions.