

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Robert Halfon, former Minister of State for Skills, Apprenticeships and Higher Education for the Department for Education. Paid appointment with the Commercial Services Group.

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 a paid role as Co-Chair of the Education Advisory Group for the Commercial Services Group (CSG).
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 CSG, as a former minister at the Department for Education (DfE). 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. CSG is a trading organisation owned by Kent County Council (KCC), which supplies products and services to numerous sectors, including the public sector and education, globally. It is a commercial arm of KCC, with its profits re-invested into KCC. You said that your role as Co-Chair of the Education Advisory Group would involve advising on how CSG can shape its direction within the education and skills sectors and attending events and conferences on behalf of CSG.
6. KCC has received funding from the Department for Education (DfE), as do all local councils. There is no evidence that you made any funding decisions for KCC, most of which were made by an arm's length body whilst you were in office. Furthermore, whilst CSG is owned by KCC, CSG was not the beneficiary of the funding. DfE confirmed that you had no contact with CSG in office, that there is no departmental relationship with CSG, and that you did not make any decisions specific to CSG. Therefore, the Committee¹ considered the risk that you were offered this role as a reward for decisions made or actions taken in office, is low.
7. As the former Minister of State for Skills, Apprenticeships and Higher Education, there are risks associated with your general access to information. The Committee considered that there are a number of limiting factors:
 - any overlap is likely to be broad rather than specific;
 - DfE is of the view that you had no access to information that could grant an unfair advantage; and
 - it has been 13 months since you left office and last had access to any privileged information, plus a change in government – meaning policies will have moved on.
8. There are risks relating to your influence and network of contacts in office, which may be seen to offer CSG unfair access to government. You told the Committee that this role will not involve lobbying of, or contact with, government.
9. There is also a risk relating to the business development aspect of your role, in that you may be seen to be able to call on contacts in external organisations gained in office, to unfairly secure investment for CSG.

The Committee's advice

10. The Committee did not consider that this appointment with the CSG raises any particular propriety concerns, and determined that the risks identified

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

above can be appropriately mitigated by the conditions below. These seek to prevent you from making improper use of privileged access to information, contacts and your influence to the company's unfair advantage.

11. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with the **Commercial Services Group Ltd** 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 any of its arm's length bodies on behalf of the Commercial Services Group Ltd (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 Commercial Services Group Ltd (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to, or on behalf of, the Commercial Services Group Ltd (including parent companies, subsidiaries, partners and clients) 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 any of 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 that you developed during your time in office in other governments and external organisations for the purpose of securing business for the Commercial Services Group Ltd (including parent companies, subsidiaries and partners).

12. 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

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

understand any other rules and regulations they may be subject to in parallel with this Committee's advice.

13. 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.
14. 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.*"
15. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so. Please 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.
16. 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 Doherty
Interim Chair
ACOBA

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 Commercial Services Group (CSG) is a large, local authority-owned trading organisation (owned by Kent County Council (KCC)) in the UK. It was established 90 years ago as the council's supplies division. It is now the commercial arm of KCC, and operates with a degree of independence. CSG operates in compliance with public sector procurement regulations and provides products and services to the education and public sector, serving over 15,000 customers in 85+ countries.
2. The organisation operates 23 trading businesses, offering a wide range of speciality services, including energy, recruitment, procurement, education supplies, IT, legal services, education management, HR, waste and landscape management, and project management.
3. As a public sector organisation, CSG is accountable to the public via KCC. The money it makes is returned to the public sector for reinvestment into front-line services, supporting the people of Kent and other communities across the UK. For example, CSG has recently partnered with Hackney Council in a joint venture called Connect2Hackney, which aims to transform the recruitment process for temporary staff across social care, waste, environmental, housing, and other front-line roles.
4. You wish to take up a part-time, paid role as Co-chair of the Education Advisory Board. You said your role would involve:
 - undertaking ambassadorial duties on behalf of CSG in the context of its education and skills facing activities. This work may include participating in conferences, representing CSG, speaking at CSG functions and events, attending (if available) the Schools and Academies Show on 15th May 2025 in London, and The Education People shows.
 - advising and contributing to shaping CSG's direction within the education and skills sectors.
 - opening up other opportunities for CSG
 - reviewing and challenging internal proposals
 - acting as a critical friend

You said that this role will not involve any lobbying of, or contact with government.

Dealings in office

5. Of your time in office, you said the following:

- You did not meet with, or have contact with CSG.
- There is no departmental relationship between DfE and CSG.
- You did not make any policy, regulatory or commercial decisions specific to CSG.

Departmental assessment

6. DfE was consulted in relation to this application. It provided the following information:

- There is no departmental relationship with CSG.
- KCC has been given funding by DfE, via the Education and Skills Funding Agency (ESFA).³ This is £3.1 million mainly apprenticeship and adult skills delivery.
- KCC is also in receipt of multiple and devolved funding. For example, in 2022, KCC entered into a financial agreement with DfE for £140million over five years (till 2027-28), to tackle financial challenges in providing services and support for children and young people with SEND.⁴
- You did not make any policy or regulatory decisions specific to CSG, though you made decisions relating to the education and skills sectors as a whole.
- You had access to broad information across the education and skills sectors, but nothing specific to CSG.
- There has been a time gap of 13 months since you left office, plus a change in government, which limits any risk with regard to your access to information.

7. DfE recommended standard conditions be imposed on this appointment.

³ The Education and Skills Funding Agency (ESFA) was formerly an executive agency of the DfE responsible for funding education and skills providers in England. It became part of DfE in April 2025.

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<https://news.kent.gov.uk/articles/how-kent-is-tackling-the-overspend-on-special-educational-needs-and-disabilities-send#:~:text=The%20agreement%20started%20in%20the,over%20the%20next%20five%20years>