



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Tom Tugendhat MBE VR MP, former Minister of State for Security, the Home Office. Paid appointment with Dossity LLC.

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 an appointment with Dossity LLC (Dossity) as Chair of the Senior Advisory Board.
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 Dossity. 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 present

5. Dossity is a US based company with no known UK presence or relationship with the UK government. You did not meet with Dossity during your time as a minister, nor did you make any decisions specific to the company whilst in

office. Therefore, the Committee¹ considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.

6. As a result of your time as a minister there are risks relating to your general access to sensitive information. These are limited given there is no direct overlap between your responsibilities in government and your proposed role with Dossity, and further mitigated by the fact that you last had access to information seven months ago.
7. As with any former minister, there are inherent risks regarding your contacts and influence within government. It is significant that Dossity does not have any discernible interest in the UK government and that your role will not involve contact with UK government.
8. The Committee considered it a general mitigating factor that this role will be facing the US and outside of the UK.

The Committee's advice

9. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Rules. The inherent risks are appropriately mitigated by the standard conditions below. In particular, they seek to prevent you from drawing on your privileged information, contacts, and influence within government to the unfair advantage of Dossity.
10. In accordance with the government's Business Appointment Rules, the Committee advises this role with **Dossity LLC** 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 Dossity LLC (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial service to influence policy, secure business/funding or otherwise unfairly advantage Dossity LLC (including parent companies, subsidiaries, partners and clients);

¹ This application for advice was considered by Andrew Cumpsty; Isabel Doherty; Hedley Finn OBE; Dawid Konotey-ahulu DL; The Rt Hon Lord Pickles; Michael Prescott; The Baroness Thornton; and Michael Weir. Sarah de Gay was unavailable.

- for two years from your last day in ministerial office you should not undertake any work with Dossity LLC (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.
11. 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 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.
 12. 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.
 13. 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.*'
 14. 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.
 15. 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.

² 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.

The Rt Hon Lord Eric Pickles

Annex - Material Information

The role

1. You told the Committee that Dossity is a US startup helping investors to understand individual risk of investments. It carries out deep investigative due diligence, balancing human and automated means to uncover management risk.
2. You said that your paid, part-time role as Chair of the Advisory Board would include the following:
 - chairing the senior advisory board and providing advice as requested to the CEO and leadership team.
 - the role is facing the USA only.
 - no contact with the UK government.

Dealings in office

3. You said that you did not meet with, nor make any decisions specific to Dossity in office, and that you did not have access to sensitive information that could grant Dossity an unfair advantage.

Departmental assessment

4. The Cabinet Office confirmed the details provided in your application. It recommended the standard conditions.