



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Lucy Frazer KC, former Secretary of State for the Department of Culture, Media and Sport. Paid appointment as a Consultant with Brunswick Group.

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 commission with Brunswick Group in a self employed capacity.
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 Brunswick Group as a former minister. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's¹ 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 between your responsibilities in ministerial office and

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

this role. You did not meet with Brunswick Group, nor did you make any decisions specific to the organisation whilst in office. Therefore, the Committee considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.

6. As a former Secretary of State, there are inherent risks associated with your access to privileged information. The risks here are limited given your proposed project work at Brunswick concerns a policy area (tech regulation) that sat outside of your departmental responsibilities at the Department for Culture, Media and Sport² (and instead is the responsibility of the Department for Science Innovation and Technology). Further, you have been out of office for ten months. However, given that Brunswick Group's clients are unknown, there is also a limited risk related to your time at DCMS, should the project work overlap.
7. There is a risk associated with your potential influence, should Brunswick be seen to make improper use of your privileged network of contacts within government - especially as the company has a clear interest in influencing government policy. This is not part of your project work as described and you confirmed you will have no contact with government. It is significant that Brunswick confirmed its adherence with the Committee's advice.

The Committee's advice

8. The Committee considered the risks associated with your access to information to be limited for the reasons above. To address the risk associated with Brunswick Group's unknown clients, the Committee has imposed a condition as is standard in such cases. This makes it clear, you should not advise on work with regard to any policy you had material involvement in or responsibility for in your recent time as Secretary of State for Culture, Media and Sport.
9. The remaining conditions below seek to prevent you from making improper use of privileged information, contacts and your influence to the company's unfair advantage. As set out in the Annex, Brunswick confirmed your limited role, working on this project, will be in compliance with the conditions below.
10. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **Brunswick Group** 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;

² The Department for Digital, Culture, Media and Sport (DCMS as it was known prior to 2023) was historically the lead government department for tech regulation and the digital economy. In February 2023, DSIT was formed, and responsibility for tech policy transferred to DSIT.

- 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 Brunswick Group (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial office to influence policy, secure business/funding or otherwise unfairly advantage Brunswick Group (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 Brunswick Group (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 advise Brunswick Group or its clients on any work with regard to any policy decisions which you had a material role in developing or determining, or where you had a relationship with the relevant client during your time as Secretary of State for Culture, Media and Sport.
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.³ 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*

³ 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.

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 employment with Brunswick, 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.
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.

Isabel Doverly

**Interim Chair
ACOBA**

Annex - Material Information

The role

1. Brunswick Group is a public relations, crisis management and related consultancy. It is registered with the Office of the Registrar of Consultant Lobbyists. You wish to take up a paid, part-time role as a consultant. Your role is to undertake a market analysis on the needs of clients for agency services in the field of tech regulation. The role will not involve any contact with government. You said that you anticipate that this work will last for approximately eight weeks. This role is internal to Brunswick and will not involve advising any clients.

Dealings in office

2. You said that you did not make any decisions specific to Brunswick Group in office, nor did you meet with the company.
3. Your proposed role with Brunswick does not have any overlap with your former ministerial responsibilities as Secretary of State for Culture, Media and Sport.

DCMS/DSIT

4. Historically, the Department for Digital, Culture, Media and Sport (DCMS as previously named) was the lead government department for tech regulation and

the digital economy. In February 2023, DSIT was formed, and the responsibility for tech policy transferred from DCMS to DSIT. This happened at the same time you were appointed as Secretary of State for the newly named Department for Media Culture and Sport (no digital). This shift to DSIT included areas such as Online Safety (in collaboration with Ofcom), Digital Competition (in collaboration with the CMA's Digital Markets Unit), Data Policy and Governance (in collaboration with the ICO), Cyber Security, and Artificial Intelligence (AI) regulation.

Correspondence with Brunswick on compliance

5. Brunswick confirmed in writing its agreement to comply with the Committee's advice, stating that it confirms that all of rules and conditions will be adhered to. Brunswick confirmed that you will be supporting a tightly ringfenced internal project on the subject of tech regulation. There will be no contact with government.

Departmental Assessment

6. DCMS confirmed the details you provided in your application and confirmed that you have no access to privileged information that could unfairly advantage Brunswick Group. It noted that DCMS was not responsible for the policy area your planned work with Brunswick will focus on.
7. DCMS proposed standard conditions.