

*From the Chair*



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

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

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

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

September 2024

**BUSINESS APPOINTMENT APPLICATION: Amanda Solloway, former Government Whip. Paid appointment with HeadHigh CIC.**

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 Director with HeadHigh CIC (HeadHigh).
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 HeadHigh. 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. There is no known overlap with your responsibilities as a minister and the work of HeadHigh, and you were not involved in any decisions specific to the

company whilst in office. Therefore, the Committee<sup>1</sup> 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 former minister, there are inherent risks associated with your access to privileged information and knowledge. The risk is significantly limited given there is no direct overlap with your previous roles in government and your former departments are not aware of any specific information you had access to that would offer an unfair advantage.
7. The Committee noted that evolving government policy on health and social care may be of particular relevance to HeadHigh as a community interest company focused on mental health. There is a risk that your time in office, including your contacts and influence, could be seen to offer HeadHigh CIC unfair access to government. You confirmed that your proposed role would not involve any contact with the government and the government's Rules prevent you from lobbying. .

#### The Committee's advice

8. The Committee did not consider this appointment raises any particular concerns under the government's Rules. The standard conditions below appropriately mitigate the risks associated with drawing on privileged information, contacts and influence gained in ministerial office to the unfair advantage of HeadHigh CIC.
9. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **HeadHigh CIC** 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 HeadHigh CIC (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

---

<sup>1</sup> This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Sarah de Gay; Hedley Finn OBE; Dawid Konotey-Ahulu CBE DL; The Rt Hon Lord Eric Pickles; Michael Prescott; and Mike Weir.

advantage HeadHigh CIC (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 HeadHigh CIC (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 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<sup>2</sup>. 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 or otherwise.
12. The Business Appointment Rules explain that the restriction on lobbying means that you "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".
13. You must inform us as soon as you take up employment with this organisation(s), or if it is announced that you will do so. Please 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.

---

<sup>2</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 Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

14. Once the appointment(s) 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.

## **The Rt Hon Lord Pickles**

### **Annex - Material information**

#### The role

1. You stated HeadHigh CIC is a mental health charity set up by yourself and you will be returning to your former role as a paid, part-time Director.
2. HeadHigh CIC is a registered Community Interest Charity<sup>3</sup>.

#### Dealings in office

3. You advised the Committee that you did not have any involvement in policy, regulatory or commercial decisions that would have been specific to the organisation.
4. You stated that you remained as an unpaid volunteer with HeadHigh during your time in office.

#### Departmental Assessment

5. The Home Office, the Department for Energy Security and Net Zero and Cabinet Office provided their views on this appointment.
6. The departments:
  - a. confirmed you did not meet with, nor involved in decisions specific to HeadHigh CIC;
  - b. had no concerns relating to your access to sensitive information specific to the organisation;
  - c. had no concerns under the Rules regarding the appointment; and
  - d. recommended the standard conditions be applied.

---

<sup>3</sup> <https://findthatcharity.uk/orgid/GB-COH-10977753>