



**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>

October 2024

**BUSINESS APPOINTMENT APPLICATION: The Rt Hon Penny Mordaunt, former Leader of the House of Commons and Lord President of the Council. Paid appointment with the Team Lewis Foundation.**

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as a Consultant for the Team Lewis Foundation (TLF).
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 TLF as a former minister. 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. Your only dealings with TLF were not in your capacity as a minister but through your friendship with Mr Lewis and the voluntary work you have undertaken for the foundation. You did not make any policy, regulatory or commercial decisions as a minister that specifically affected TLF. The

Committee<sup>1</sup> considered that the risk that this role could be seen as a reward for your decisions in office is low.

6. There is no known overlap between your responsibilities as a minister and the work of TLF. As the former Lord President of the Council and Leader of the House of Commons, there are inherent risks associated with your access to privileged information. The Department for Business and Trade (DBT) and the Cabinet Office were not aware of any specific information you have had access to that would offer an unfair advantage to TLF. It is also relevant that as a former Cabinet minister, you are subject to a three month waiting period. This creates a gap between your access to information and your employment with TLF.
7. Given that TLF's clients are unknown, there is a risk related to a potential overlap with your time in office. Whilst TLF's clients are charities and non-profit organisations, the specific nature of your role as a Consultant, and the fact that the charity sector is wide reaching, means you could be asked about matters or organisations you were materially involved in whilst in office.
8. You told the Committee that it is not your intention to have contact with government in this role. You are prevented from lobbying government for two years on leaving office, as all former ministers are under the government's Rules. It is significant that this application for advice is to work with TLF, and not its parent company Team Lewis which is a public relations firm. Nonetheless, there remains a risk you may be perceived as offering unfair access and influence in this role.

#### The Committee's advice

9. The Committee considers it significant that this advice offers approval to work with TLF only, and that TLF has confirmed that conditions can and will be adhered to.
10. The Committee considered the risks in this case can be appropriately mitigated by the conditions below. These include a condition that prevents you from advising on any matters that you had a material role in developing or determining whilst Lord President of the Council and Leader of the House of Commons - given the precise nature of the work, and which clients within the charitable sector you will advise, are unknown.

---

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

11. The remaining conditions seek to prevent you from making improper use of privileged information, contacts and influence to the unfair advantage of TLF.
12. Additionally, as a former member of the Cabinet, you are subject to a standard three month waiting period.
13. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Team Lewis Foundation** be subject to the following conditions:
- a three month waiting period from your last day in office;
  - 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 Team Lewis Foundation (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 contacts to influence policy, secure business/funding or otherwise unfairly advantage Team Lewis Foundation (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 Team Lewis Foundation (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid/contract/funding relating directly to the work of the UK government or any of its arm's length bodies; and
  - for two years since your last day in office, you should not advise Team Lewis Foundation or its clients on any work with regard to any 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 Lord President of the Council and Leader of the House of Commons.
14. 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.

15. 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.
16. 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.*"
17. 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.
18. 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.

The Rt Hon Lord Pickles

## **Annex- material information**

### The role

1. Lewis Communications Ltd is a communication and marketing company. It offers services in:
  - Digital marketing
  - PR

---

<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.

- Strategic services
  - Digital experiences.
2. Lewis Communications Ltd has a philanthropic organisation, Team Lewis Foundation (TLF), which gives grants to charities. Its website says that its non-profit arm donates time, money and creative services to help charitable organisations achieve their ambitions.
  3. You wish to take up a paid, part-time role as a Consultant for TLF. You said your role would include:
    - mentoring leadership
    - making recommendations as to how the charities could enhance their profiles, raise awareness and generate more income
    - attending fundraising, thought leadership and networking events that the charities or the TLF host
    - engaging with key stakeholders, including donors, trustees, to garner support for fundraising initiatives
    - making recommendations for additional charities for the TLF to support
    - No contact with government.

#### Dealings in office

4. You told the Committee that you were not involved in policy, regulatory, operational or commercial decisions specific to TLF, nor did you have access to sensitive information specific to the foundation during your time in office.
5. You said that you did not meet with TLF whilst in office but had worked for TLF previously on a voluntary basis. ACOBA notes that you have reportedly known Mr Lewis, founder and CEO of Team Lewis for some time, and have co-authored a book with him<sup>3</sup>.

#### Departmental assessment

6. DBT and the Cabinet Office confirmed the details in your application, including no overlap with your responsibilities or access to information; and recommended the standard conditions.

---

3

<https://the-week-bookshop.myshopify.com/products/greater-britain-after-the-storm-by-penny-mordaunt-and-chris-lewis>