



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Bim Afolami, former Economic Secretary to the Treasury, His Majesty's Treasury. Unpaid appointment with Quoted Companies Alliance.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) on an unpaid role you want to take up with Quoted Companies Alliance (QCA) as a Board Member.
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 QCA. 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. When considering this application, the Committee¹ took into account this appointment is unpaid². Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of the Government by considering the real and perceived risks associated with former ministers joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions or take action in office to in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. There is an overlap between your role as Economic Secretary to the Treasury and the work of QCA and its members given you were responsible for overall policy related to UK capital markets. Your decisions in office may have affected some members of QCA, but were sector wide. There is no suggestion you would have access to any particular information that would unfairly benefit the organisation and the unpaid nature of this appointment limits the real and perceived risk of you making improper use of information you had access to while in office for your personal benefit.
7. You confirmed your role will not involve contact with government.

The Committee's advice

8. The Committee considered the risks associated with your access to information were limited for the reasons above. It is important you ensure there can be no reasonable cause for concern that you are lobbying the UK government - whether directly or indirectly in this role.
9. The standard conditions below seek to prevent you from making improper use of privileged information, contacts and influence to the unfair advantage of the organisation and its members.
10. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Quoted Companies Alliance** be subject to the following conditions:

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

²By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

- 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 arms' length bodies on behalf of Quoted Companies Alliance (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 Quoted Companies Alliance (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 Quoted Companies Alliance (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 arms' 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.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. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so and we will publish this letter on our website. Any failure to do so may lead to a false assumption being made about whether you had complied with the Rules.
13. You must 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.
14. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website

The Rt Hon Lord Pickles

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.

Annex - Material Information

The role

1. QCA is a non-profit membership organisation which champions the UK's community of 1000+ small and mid-sized publicly traded businesses and the firms that advise them. It is a private company limited by guarantee without share capital- board members do not make profit.
2. You wish to take up a part-time, unpaid role as a Board Member with QCA. You said:
 - QCA directors are drawn from across the membership, the City of London and UK plc. They determine the strategy of the organisation, approve the annual budget and set annual membership fees for corporate and adviser members as part of that process;
 - you will attend 6, 1 hour meetings per year;
 - your role will not involve contact with government.

Dealings in office

3. You said that your role in office was to promote the health of UK capital markets, and take action to further that goal. QCA represents UK quoted companies, and you made broad policy decisions that affected this sector as a whole. You said that you did not make any commercial decisions specific to QCA.
4. You said that you met with the CEO, James Ashton, of QCA on a couple of occasions whilst in office in line with the work you were doing on the promotion of the health of UK Capital Markets. You said you also went to speak to a group of QCA's members during your time in office.

Departmental assessment

5. HMT said that you were involved in multiple discussions and policy decisions related to capital markets policy reforms to regulation and to boost investment into unlisted equities including small and mid-sized firms represented by the QCA. You met with a range of officials, regulatory authorities and members of the sector on multiple occasions- and so may have had some access to some privileged information discussed during these meetings. However, this is likely to be limited and you made no significant policy decisions which were enacted prior to the election and is therefore unlikely to be able to offer any unfair insight to the QCA.

6. HMT said that you had several interactions with QCA and you:
 - declined an invitation to deliver a keynote speech at the QCA's annual conference on 6 June 2024;
 - attended a breakfast roundtable hosted by the QCA with its members on 7 December 2023, focussed on the government's programme of capital market reforms;
 - responded to correspondence from the CEO of the QCA (James Ashton) focused on government reforms to boost investment into UK markets;
 - attended a range of other events focused on capital markets during which he may have met members of the QCA.
7. HMT noted that QCA regularly engages with government officials and ministers on policy related to UK capital markets, with a particular focus on policy issues impacting small and mid-sized publicly listed firms e.g. regulation and tax. It also regularly provides representations to public consultations.
8. HMT recommended standard conditions.