

From the Chair



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 Spoken Ltd.

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 an appointment as a speaker with Spoken Ltd (Spoken).
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 Spoken. The material information taken into consideration by the Committee is set out in the annex below.
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. The Committee¹ noted you did not meet with nor have any official dealings with Spoken in office, and therefore the risk this role could reasonably be seen as a reward for decisions made, or actions taken, in office is low.

The Committee's advice

6. The Committee does not consider joining a speaking agency to raise any particular concerns under the government's Business Appointment Rules, provided it is subject to standard conditions which prevent improper use of information and influence. It is an individual's responsibility to manage the propriety of the specific pieces of work undertaken.
7. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Spoken Ltd** 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 Spoken Ltd (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 Spoken Ltd (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 Spoken Ltd (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.
8. 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

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.

Registrar of Lords' Interests.² 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.

9. 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.
10. 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.'*
11. 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 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.
12. 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

² 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. You informed the Committee you wish to take up a paid, part-time role as an ad hoc public speaker with Spoken – a speaking agency which works with global businesses, institutions and individuals, mainly providing services on research, programme development, speaker management, and thought-leadership content creation.
2. You confirmed this role would not involve contact with government.

Dealings in office

3. You did not meet with Spoken while in office; there is no relationship between Spoken and your former department; and you confirmed that you did not have any involvement in any decisions specific to Spoken while in office.

Department Assessment

4. The Home Office confirmed the details in your application and recommended the standard conditions be applied to this advice.