

*From the Chair*



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

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**BUSINESS APPOINTMENT APPLICATION: Lord Andrew Sharpe of Epsom OBE, former Parliamentary Under Secretary of State at the Home Office. Paid appointment with Primary Access and Research 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 a paid appointment with Primary Access and Research Ltd (Primary Access) as an Adviser.
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 Primary Access, as a former minister. 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. Primary Access is a management consulting firm that provides fundraising advisory for new companies and connects them to a network of investors, and carries out research focused on industry disruption and political risk. Its clients are mainly

focused on technology, health, and science. You said that your role as an Adviser will include authoring politically-focused research articles, assisting with venture capital fundraising, and advising clients.

6. The Home Office said that there is no departmental relationship with Primary Access, and you did not meet with, nor did you make any decisions specific to Primary Access while in office. In addition, you held a Non-Executive Directorship with Primary Access before entering government, from 2019-2021. The Committee<sup>1</sup> considered that the risk this role could reasonably be seen as a reward for your decisions made in office is low.
7. There is a broad risk associated with your access to information in office. This risk may be heightened should you be asked to advise Primary Access' unknown clients on matters that overlap with your ministerial portfolio. However the Committee notes that there are factors that limit this risk:
  - any overlap is likely to be broad rather than specific;
  - the Home Office said that you did not have access to information that could grant an unfair advantage; and
  - it has been nine months since you left office and last had access to any privileged information.
8. There are risks relating to your influence and network of contacts in office, which may be seen to offer an unfair access to government. There is also a risk relating to the business development aspect of your role. You may be seen to be able to call on contacts in external organisations that you gained only as a result of your time in office, to unfairly secure investment for Primary Access' clients. The Committee notes that you had a career prior to your time as minister in investment banking, meaning you are likely to have a network of contacts that you can call on for investment, and it would not be inappropriate for you to do so.

#### The Committee's advice

9. The main risk in this case is that your work could overlap with your responsibilities in office. To address this, the Committee has imposed a condition on your role that prevents you from working on matters directly overlapping with your ministerial responsibilities, or where you had a material relationship with the client in office. It is significant that Primary Access has provided written confirmation that it accepts this advice and will ensure compliance with the conditions in this letter.
10. The Committee determined that the remaining risks in this case can be appropriately mitigated by the conditions below. These seek to prevent you from

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

making improper use of privileged access to information, contacts and your influence to the company's unfair advantage.

11. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **Primary Access and Research 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 any of its arm's length bodies on behalf of Primary Access and Research 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 Primary Access and Research Ltd (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to on behalf of Primary Access and Research Ltd (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 Primary Access and Research Ltd or its clients on any work with regard to any policy you had specific involvement in or responsibility for as Parliamentary Under Secretary of State at the Home Office, or where you had a relationship with the relevant client during your time as Parliamentary Under Secretary of State at the Home Office; and
- for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you developed during your time in office and in other Governments and organisations for the purpose of securing business or funding for Primary Access and Research Ltd (including parent companies, subsidiaries and partners)

12. 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> As a Member of the House of Lords, you are prevented from any paid lobbying under the House of Lords Code of Conduct. 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.

13. 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.
14. 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."*
15. 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.
16. 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 Doverty  
Interim Chair

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<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.

## **Annex- material information**

### The role

1. Primary Access and Research Ltd is a UK-based management consulting firm that helps clients navigate, through research, industry disruption and political risk (the risk that an investment's returns could suffer as a result of political changes or instability in a country); and provides fundraising advisory for start-ups and scale-ups and connects them to a network of investors (venture capital firms, EIS funds, family offices and angel investors). Its listed clients have a tech, health or science focus.
2. You told the Committee that your paid, part-time role as an Adviser would include:
  - authoring politically-focused research articles
  - using your financial markets network to help with venture fundraising
  - engaging with clients on an ad-hoc basis.
3. You said that there would be no contact with government in this role.
4. You said that you did not apply for this post: you are a minority shareholder of Primary Access and Research Ltd and were a non-executive director from April 2019 to October 2021, prior to entering government.
5. You have had a former career in the financial services industry, at Morgan Stanley, UBS, and Redburn Partners.

### Dealings in office

6. Of your time in office, you said the following:
  - you did not make any policy, commercial or regulatory decisions specific to Primary Access;
  - you did not have any contact with Primary Access;
  - there is no departmental relationship between Primary Access and the Home Office;
  - you did not have access to sensitive information in your ministerial role that could grant Primary Access an unfair advantage.

### Departmental assessment

7. The Home Office confirmed the details above. It recommended the standard conditions.