

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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November 2024

BUSINESS APPOINTMENT APPLICATION: The Rt Hon Dominic Raab, former Deputy Prime Minister, Lord Chancellor and Secretary of State for Justice. Paid appointment with The PLB Group Ltd.

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 your role as Senior Consultant with The PLB Group Ltd (PLB Group)
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 you made during your time in office, alongside the information and influence you may offer the PLB Group. 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 Rules¹ set out that former ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers 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

¹ Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code.

5. The Cabinet Office and Ministry of Justice (MOJ) confirmed you did not meet with, nor had involvement in any decisions specific to the PLB Group during your time in office. The Committee² considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
6. As Deputy Prime Minister, Lord Chancellor and Secretary of State for Justice you had access to sensitive information across government. The Cabinet Office and MOJ confirmed they are not aware of any information you had access to that would now offer an unfair advantage to the PLB Group, given it has been 18 months since you left government.
7. There are risks associated with your influence and network of contacts gained whilst in ministerial office, should they be used to offer PLB Group unfair access. You have confirmed your role will not involve contact with, or lobbying of government.

The Committee's advice

8. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information or influence gained from your time in ministerial service to the unfair advantage of the PLB Group.
9. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **The PLB Group 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 The PLB Group 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 The PLB Group Ltd (including parent companies, subsidiaries, partners and clients); and

² This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; David Konotey-Ahulu CBE DL; Sarah de Gay; The Rt Hon Lord Pickles; Michael Prescott; and Mike Weir.

- for two years from your last day in ministerial office, you should not undertake any work with The PLB Group 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.
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' Interests³. 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, 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.
 14. 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.

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.

The Rt Hon Lord Pickles

Annex – Material Information

The role

1. According to its website, the PLB Group is a provider of retail displays, using IT solutions.
2. In your (paid) role as Senior Consultant, you stated your role is focussed on strategy and governance for the company.
3. You confirmed your role will not involve contact with, or the lobbying of government.

Dealings in office

4. You informed the Committee that you did not have dealings with, nor involved in any policy, commercial or regulatory decisions, nor had access to sensitive information specific to the PLB Group.

Departmental assessment

5. The Cabinet Office and MOJ provided their views for this appointment.
6. The departments confirmed:
 - You were not involved in policy, regulatory or commercial decisions specific to PLB Group, nor did you meet with them during your time in office.
 - They did not consider you to possess sensitive information specific to the PLB Group that may confer an unfair advantage.
 - In relation to your access to sensitive information, the MOJ noted a significant time has elapsed since you left office, 18 months ago.
7. The departments did not have concerns with the appointment and recommended the standard conditions.