



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Lord Evans of Rainow, former Government Whip in the House of Lords. Paid appointment with Low Associates as Chair of the Greater Cheshire Development Forum.

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 role as Chair of the Greater Cheshire Development Forum with Low Associates.
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 taken during your time in office, alongside the information and influence you may offer Low Associates, 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. Low Associates is a strategic communications and policy consultancy which creates forums to facilitate dialogue between its paying clients and public bodies. As Chair of the Greater Cheshire Development Forum, your role will be

to shape the forum's agenda, recruit members, and represent its interests to stakeholders in the Cheshire region.

6. You did not meet with, nor did you make any policy, regulatory or commercial decisions specific to Low Associates in office; and there is no departmental relationship between the Cabinet Office and Low Associates. Therefore, the Committee¹ considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.
7. As a minister it is likely that you had access to a range of information that could benefit any organisation. The Committee considered the risks limited in this case because:
 - there is no discernible overlap between your specific responsibilities as a Government Whip and the work of Low Associates, which is focused on local development;
 - the Cabinet Office did not highlight any specific or sensitive information you had access to that would present a risk in this role; and
 - it has been a year, and a change in government administration since you left office – providing a gap that reduces the currency of any information you possess.
8. The Committee considered the main risks in this case relate to influence and your network. Your role is to represent the Greater Cheshire Development Forum and recruit its members - where you could be seen to be advancing the interests of a wide range of commercial entities. Further, your work will be focused on influencing local and regional authorities. There is a risk you could be seen to be using the influence and contacts within government and external organisations gained from your position of Whip in the House of Lords, to unfairly advantage Low Associates. It is significant that Low Associates confirmed that:
 - a. it will adhere to the Rules and the conditions of this advice; and
 - b. you will not lobby the government whilst subject to the Rules.

The Committee's advice

9. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that you must not make use of privileged information or influence gained from your time in ministerial service to the unfair advantage of Low Associates and/or its clients.

¹ This application for advice was considered by Isabel Doverty; Sarah de Gay; Hedley Finn OBE; Dawid Konotey-Ahulu CBE DL; and Michael Prescott; and The Baroness Thornton.

10. In coming to this view it is significant that Low Associates confirmed its adherence to the Committee's advice and in particular that you would not be involved in any lobbying of the UK government.

11. The Committee advises, under the government's Business Appointment Rules, that your appointment with **Low Associates** 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 service;
- for two years from your last day in ministerial service, you should not become personally involved in lobbying government or any of its arm's length bodies on behalf of Low Associates (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Low Associates (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial service, you should not provide advice to Low Associates (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 and its arm's length bodies; and
- for two years from your last day in ministerial service, you should not become personally involved in lobbying contacts you developed during your time in office in other governments and organisations for the purpose of securing business and/or sponsorship opportunities for Low Associates (including parent companies, subsidiaries, partners and clients).

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' Interests². It is an applicant's personal responsibility to

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.

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 this role, or if it is announced that you will do so. You must 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 Doherty

**Interim Chair
ACOPA**

Annex – Material Information

The role

1. Low Associates Ltd is a strategic communications and policy consultancy with offices in London and Brussels. The company creates and manages 'Development Forums' which bring together paying members from the development and business sectors with local and regional authorities. The Greater Cheshire Development Forum is one of these such forums.
2. You propose to take up a paid, part-time role as Chair of the Greater Cheshire Development Forum. You have stated that this role will not involve contact with or lobbying of the UK Government. Your responsibilities will include:
 - Shaping meeting agendas for the forum.
 - Chairing up to eight meetings of the forum annually.
 - Assisting in the recruitment of forum members.
 - Representing the forum's interests to stakeholders in Cheshire and the North West of England.
3. You were recommended for the role due to your strong connections to Cheshire, having been a local councillor in Macclesfield and the Member of Parliament for Weaver Vale.

Correspondence with Low Associates

4. Low Associates confirmed in writing its understanding of, and agreement to, comply with the Committee's advice. The CEO provided the following in writing:

'...Low Associates will adhere to the Rules and the conditions of the advice contained in the ACOBA letter.'

In relation to your role and responsibilities, Low Associates added:

'As Chair of the Greater Cheshire Development Forum, your role will be to bring his expert understanding of Cheshire to bear in enabling the development community to support the successful delivery of high-quality development in the Greater Cheshire region.'

This would include discussion in the Forum of planning and policies relating to development but would not involve lobbying of local or national authorities in

relation to the particular interests of members of the Forum or in relation to their specific projects.'

Dealings in Office

5. You provided the Committee with the following information about your role as a Government Whip:
 - you did not make any policy, regulatory, or commercial decisions that impacted Low Associates Ltd.
 - you did not meet with Low Associates Ltd.
 - you had no access to sensitive information that could grant Low Associates Ltd or its clients an unfair advantage.
 - there is no overlap between the responsibilities of your proposed role and your former ministerial duties.

Departmental Assessment

6. The department confirmed you were not involved in any regulatory or policy decisions that impacted Low Associates Ltd and stated that there is no departmental relationship with the company.
7. The department confirmed you did not have access to sensitive information relevant to Low Associates Ltd.
8. The department recommended the standard conditions would appropriately mitigate any risks.