



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Tom Tugendhat, former Minister of State (Minister for Security) at the Home Office. Unpaid appointment with the Hudson Institute.

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 the Hudson Institute.
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 you had access to. 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 Committee took into account this appointment as a Distinguished Fellow is unpaid. 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, 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 are inherent risks associated with any former minister's access to information, network of contacts and influence in government. In this case there is also a broad overlap between the policy work of the Hudson Institute and your role at the Home Office. It is noted that the Home Office did not raise any issues that would grant Hudson Institute an unfair advantage, and that in your proposed role, you will not have any contact with the government.

The Committee's advice

7. The Committee did not consider this appointment raises any particular concerns under the government's Business Appointment Rules. Whilst there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below, preventing you from drawing on your privileged information and using your contacts to the unfair advantage of the Hudson Institute, will sufficiently mitigate the risks in this case.
8. Therefore, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the Hudson Institute 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 arms' length bodies on behalf of Hudson Institute (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 Hudson Institute (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 Hudson Institute (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.

9. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; there are separate 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. You are reminded that as a Member of Parliament you have a separate ban on paid lobbying under the Parliamentary 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.
10. 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. 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.
11. 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

Annex - Material Information

The role

1. The Hudson Institute is a non-partisan American policy research group. It is involved in: interdisciplinary studies in defence, international relations, economics, energy, technology, culture, and law guiding policymakers and global leaders in government and business through publications, conferences, briefings, and recommendations. It has worked with governments and industries including defence and agri-business. It is funded by individuals, foundations, corporations, and foreign governments.
2. You wish to take up a part-time, unpaid role as a Distinguished Fellow. The role will be to support research and writing on matters of policy and ideas as appropriate. You stated this role will not involve contact with the government.

Departmental Assessment

3. The Home Office confirmed the details provided in your application and recommended the standard conditions.