



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

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**BUSINESS APPOINTMENT APPLICATION: Mr Tom Pursglove, former Minister of State for Legal Migration and the Border at the Home Office and prior to that, Minister of State for Disabled People, Health and Work at the Department for Work and Pensions. Paid appointment with SPL Strategies 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 role as Strategic Advisor with SPL Strategies Ltd (SPL Strategies).
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 SPL Strategies. 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. SPL Strategies is a registered consultant lobbyist, delivering in public relations and campaigns, communications and branding, polling and data research,

crisis management, videography, events and conferencing along with business development expertise and experience across a broad range of sectors. The Home Office and Department for Work and Pensions (DWP) confirmed you did not meet with SPL Strategies, nor were you involved in decisions specific to the company. The Committee<sup>1</sup> considered the risk that you were offered this role as a reward for decisions or actions taken in post was low.

6. It is likely that you had access to a broad range of sensitive information that may provide any company an unfair advantage, including SPL Strategies. The Home Office and DWP confirmed that they were not concerned about any specific information to which you had access that could offer an unfair advantage to the company. This is a general risk and you have been out of office for over 12 months – putting a gap between you last having had access to information and taking up this role. The risk regarding your access to information is greatest should you advise SPL Strategies or its clients in relation to matters you had specific responsibility for.
7. There are also risks associated with your contacts and influence within government, particularly in the context of working for a public relations firm that has interest in influencing government policy. The Committee considered it significant that:
  - your role as Advisory Board Member excludes any dealings with government; and
  - SPL Strategies has confirmed that you will not undertake any activities which conflict with ACOBA's advice and you will not be involved in lobbying the UK government.
8. Both of the noted factors above reduce the risk you might be seen as lobbying government in this role, which former ministers are prevented from doing for two years on leaving office under 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 cannot make use of privileged information, contacts or influence gained from your time in ministerial service to the unfair advantage of SPL Strategies.

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

10. SPL Strategies 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. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **SPL Strategies 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 SPL Strategies Ltd (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage SPL Strategies Ltd (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office you should not undertake any work with SPL Strategies 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; and
- for two years since your last day in ministerial office, you should not advise SPL Strategies Ltd (including parent companies, subsidiaries, partners and clients) on any policy you had specific involvement in or responsibility for as Minister of State for Legal Migration and the Border at the Home Office and Minister of State for Disabled People, Health and Work at the Department for Work and Pensions, nor where you had a relationship with the relevant client during your respective roles in office.

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> 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 Ministerial Code or otherwise.
14. 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*".
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 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  
ACOBA**

## **Annex - material information**

### The role

1. According to its website, SPL Strategies Ltd offers a range of services for small and medium-sized enterprises and educational institutions. SPL Strategies delivers public relations and campaigns, communications and

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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.

branding, polling and data research, crisis management, videography, events and conferencing together with business development expertise and experience across a broad range of industry sectors. It provides services to a range of sectors, but with a focus on the sustainability, environmental and the 'green skills' sectors. As part of its service offer, SPL Strategies Ltd offers public affairs and campaign services to help '*navigate the complexities of government*' and '*connect with key decision-makers*'. It is registered on the Office of the Registrar of Consultant Lobbyists<sup>3</sup>.

2. In your paid, part-time role as Advisory Board Member, you stated the role would be akin to that of a NED – to guide, scrutinise and advise, particularly around generating awareness of their service offer and the delivery of it, drawing on your broad skills. You stated you would be providing strategic analysis, support and advice to SPL Strategies Ltd on UK public policy and regulatory developments and the broader political landscape which may affect their interests, where relevant. SPL Strategies stated that your role is advisory in nature and you will provide occasional strategic advice to its team and to specific clients where your expertise is relevant.
3. As Advisory Board Member, you confirmed you would not:
  - be directly or indirectly lobbying government ministers or officials, or have any engagement with the UK government on behalf of SPL Strategies Ltd.
  - seek to draw on your network of contacts in government.
  - disclose privileged information from your time in government.
  - have involvement with bids or contracts involving the UK government.

#### Correspondence with SPL Strategies

4. SPL Strategies confirmed in writing its understanding of, and agreement to comply with, the Committee's advice. The company confirmed your role will not involve lobbying of the UK government.

#### Dealings in office

5. You confirmed that you did not meet with SPL Strategies during your time in office, nor were you involved in decisions nor did you have access to sensitive information specific to the company.

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<sup>3</sup> [orcl.my.site.com/CLR\\_Public\\_Profile?id=001Tu00000S8dIIIAB](https://orcl.my.site.com/CLR_Public_Profile?id=001Tu00000S8dIIIAB)

### Departmental assessment

6. The Home Office and DWP confirmed the details you provided, stating:
  - they did not have any concerns regarding decisions or policies made during your time in office that could provide an unfair advantage to SPL Strategies.
  - they did not consider you to possess sensitive information that could provide an unfair advantage to SPL Strategies.
7. The departments recommended the standard conditions apply to your proposed appointment.