



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

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**BUSINESS APPOINTMENT APPLICATION: Tom Pursglove, former Minister of State for Legal Migration and the Border at the Home Office. Previously, Minister of State for Disabled People, Health and Work at the Department for Work and Pensions and before that, Minister of State for Crime and Policing at the Home Office. Unpaid appointment with Special Olympics Great Britain.**

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 an unpaid role as a Member of the Advisory Board with Special Olympics Great Britain (Special Olympics GB).
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 Special Olympics GB. 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<sup>1</sup> took into account that this appointment as a Member of the Advisory Board with Special Olympics GB is unpaid<sup>2</sup>. 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 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. As Minister of State for Disabled People, Health and Work at DWP, you oversaw cross-government disability issues and supported the government's approach to developing a bid for the Special Olympic World Summer Games 2031 to be hosted in the UK. You are now seeking to join Special Olympics GB's Advisory Board to assist in the day-to-day development of the organisation, a role that will not be involved in the bid. The risks associated with your access to information are limited in this unpaid role.
7. The Committee recognised the possible risk, even in this unpaid role that you may be seen to offer access to contacts and influence regarding Special Olympics GB's work to gain government's support to host and deliver the 2031 Special Olympics World Summer Games. This might raise a reasonable concern that the role might involve lobbying the government, which all former ministers are prevented from doing for two years on leaving office. It is significant that this is an unpaid role limited to sitting on an Advisory Board which has no involvement in bidding.

## The Committee's advice

8. The Committee did not consider this unpaid appointment to raise any particular concerns under the government's Business Appointment Rules, subject to the standard conditions. These sufficiently mitigate the risks, and seek to prevent you from making improper use of privileged information, contacts and influence to the unfair advantage of the organisation.

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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; Michael Prescott; and The Baroness Thornton.

<sup>2</sup> By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

9. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Special Olympics Great Britain** 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 Special Olympics Great Britain (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 Special Olympics Great Britain (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 Special Olympics Great Britain (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' Interests<sup>3</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.
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*

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<sup>3</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 Commissioner for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

*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 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.

Isabel Doverty

**Interim Chair  
ACOBA**

## Annex – Material Information

### The role

1. Special Olympics Great Britain is a non-profit organisation, providing year-round sports participation in a variety of Olympic-type sports for children and adults with intellectual disabilities<sup>4</sup>. It is registered under the charity number 800329. Special Olympics GB's aspiration is to follow-up and deliver on the action included in the previous government's 'Disability Action Plan', published in February 2024, stating:

*'DU [Disability Unit] will work with other government departments and external experts in the coming months to explore bidding to host and deliver the 2031 Special Olympics World Summer Games.'*

2. In your unpaid role as a Member of the Advisory Board, you stated your role will be focussed on supporting and advising in the main Special Olympics GB structure to support its day-to-day development, and will not be involved in the Bid Board.
3. You stated that, prior to the recent General Election, Special Olympics GB were engaged for several months with the Cabinet Office regarding the bid to host the 2031 Summer Games in order to seek government's support for the bid. You confirmed that you would have no involvement in this process as part of this unpaid role.

### Dealings in office

4. During your time at the Home Office, you were not involved in any decisions, nor did you have access to sensitive information specific to Special Olympics GB, nor did you have any dealings with the organisation.
5. During your time at DWP, you were involved in policy work to explore the aspirations of Special Olympics GB, including exploring a future within the UK, as set out in the previous government's Disability Action Plan in early 2024. You stated this was announced by your successor.
6. During your time at DWP, you had contact with Special Olympics GB in 2023:
  - on the behalf of government, you visited the Special Olympics World Games in Berlin where you observed the operation of a World Games and met the Team GB delegation; and

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<sup>4</sup> Special Olympics uses 'intellectual disabilities' to describe learning disabilities  
[www.csp.org.uk/system/files/learning\\_disabilities\\_bild.pdf](http://www.csp.org.uk/system/files/learning_disabilities_bild.pdf)

- you attended a stakeholder meeting at Special Olympics GB's invitation to discuss its broad domestic work of Special Olympics GB and its aspirations to host the World Summer Games.

### Departmental assessment

7. DWP confirmed you were involved in discussions with government officials, including No. 10, the Department for Culture, Media and Sport, the Disability Unit (at the Cabinet Office) and other stakeholders about:
  - continuing to involve Special Olympics GB as part of a potential bid to host the Special Olympics;
  - whether the UK government should support such a bid, how it should be resourced/prepared and whether a commitment to it should be included in the Disability Action Plan consultation document<sup>5</sup> published in July 2023;
  - committing to '*commissioning a feasibility report into Great Britain bidding to host the Special Olympics World Summer Games in 2031*' and including it in the draft Disability Action Plan; and
  - Including Special Olympics GB as a stakeholder in the development of the invitation to tender for the study. It was not one of the suppliers that the department would have expected to bid for the contract directly. This was paused when the General Election was called.
8. Further to the above, DWP stated:
  - direct engagement with Special Olympics GB was taken forward largely by the Cabinet Office's Disability Unit and specific individuals within No. 10, not you; and
  - the final decision as to whether or not the commitment should be included in the plan<sup>6</sup> published in February 2024 was made by your successor and you were not involved in the finalisation of this. DWP stated that a commitment to continue this work was included in the 2024 Conservative Manifesto ("*In the next Parliament we will [...] explore bidding to host and deliver the 2031 Special Olympics World Summer Games*")<sup>7</sup>.
9. DWP stated you were initially privy to conversations about a possible bid for the UK to host future Special Olympic Summer Games (in which Special Olympics GB would have been closely involved) including discussion of how a bid could be resourced and taken forward across Whitehall. DWP considered

<sup>5</sup> [https://assets.publishing.service.gov.uk/media/64b56f4f0ea2cb001315e434/Consultation\\_-\\_Disability\\_Action\\_Plan\\_2023\\_to\\_2024\\_web\\_accessible\\_version\\_.pdf](https://assets.publishing.service.gov.uk/media/64b56f4f0ea2cb001315e434/Consultation_-_Disability_Action_Plan_2023_to_2024_web_accessible_version_.pdf)

<sup>6</sup> <https://assets.publishing.service.gov.uk/media/65bce88fc4319100141a449c/Disability-Action-Plan-PDF.pdf>

<sup>7</sup> <https://public.conservatives.com/static/documents/GE2024/Conservative-Manifesto-GE2024.pdf>

relevant knowledge you had will now be well out of date given you left your role over 18 months ago. Overall DWP did not consider you to possess sensitive information that may confer an unfair advantage to the organisation.

10. There is no known overlap with your role at the Home Office as confirmed by the Home Office. The Home Office and DWP recommended the standard conditions.