



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

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**BUSINESS APPOINTMENT APPLICATION: The Rt Hon Steve Baker FRSA, former Minister of State for Northern Ireland and Minister of State in the Cabinet Office. Paid appointment with Net Zero Watch Limited.**

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) on taking up a paid appointment with Net Zero Watch Limited (Net Zero Watch).
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 a former minister may offer Net Zero Watch. 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. Net Zero Watch is a UK-based initiative affiliated with the Global Warming Policy Foundation . The organisation seeks to inform policymakers and the public about the challenges and opportunities associated with net-zero objectives.
6. There is no direct overlap with your responsibilities in ministerial office and this role. The Northern Ireland Office (NIO) drew ACOBA's attention to a

donation from Neil Record, Chair of Net Zero Watch. You received the donation, made by Mr Record as a private individual and declared in your parliamentary register of interests in January 2023<sup>1</sup>, in your capacity as an MP – not as a minister. The NIO and the Cabinet Office confirmed that you did not meet with, nor were you involved in decisions specific to Net Zero Watch whilst in ministerial office. The donation is not, therefore, relevant to this application and the department has flagged no action beneficial to Net Zero Watch taken in your ministerial capacity. The Committee<sup>2</sup> considered that the risk that this commission could reasonably be perceived to be a reward for decisions made or actions taken in office is low.

7. As a former minister, there are inherent risks that you may have had access to sensitive information that could benefit a range of organisations. The Northern Ireland Office (NIO) and the Cabinet Office confirmed they are not aware of any sensitive information you have access to that would offer an unfair advantage to Net Zero Watch. Further, it has been 12 months and a change in government administration since you left office – reducing the currency of information you had access to. The Committee considered these mitigating factors limit the real and perceived risks associated with your access to sensitive information.
8. As with any former minister, there are risks associated with your contacts and influence within government and the potential for Net Zero Watch to gain unfair access or influence as a result. The Committee considered it significant that you said your role will exclude any dealings with government and Net Zero Watch confirmed your role will be separated from any lobbying activity – in accordance with the ban on lobbying government that applies to all former ministers for two years after leaving office.

#### The Committee's advice

9. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These seek to prevent you from making use of privileged information, contacts and influence gained from your most recent time in ministerial office to the unfair advantage of Net Zero Watch.
10. Net Zero Watch confirmed its adherence with the Committee's advice and, in particular, that you would not be involved in any lobbying of the UK government.

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<sup>1</sup> [publications.parliament.uk/pa/cm/cmregmem/230123/Updates%20-%2010-23%20January%202023.pdf](https://publications.parliament.uk/pa/cm/cmregmem/230123/Updates%20-%2010-23%20January%202023.pdf)

<sup>2</sup> This application for advice was considered by Isabel Doverty; Hedley Finn OBE; Sarah de Gay; Dawid Konotey-Ahulu CBE DL; The Baroness Thornton; and Michael Prescott.

11. The Committee advises, under the government's Business Appointment Rules, that your appointment with **Net Zero Watch** 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 Net Zero Watch (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 Net Zero Watch (including parent companies, subsidiaries, partners and clients); and
- for two years from your last day in ministerial service, you should not provide advice to Net Zero Watch (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.

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>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.

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*

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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 Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

*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 Doverly

**Interim Chair  
ACOBA**

### **Annex – material information**

#### The role

1. Net Zero Watch is a UK-based initiative affiliated with the Global Warming Policy Foundation. It focuses on examining the implications of achieving net-zero greenhouse gas emissions by 2050. The company aims to provide analysis and promote discussion on the economic, social, and environmental impacts of net-zero policies. It conducts research, publishes reports, and offers insights on various aspects of energy transition and climate policy, encouraging a balanced debate on the topic. Net Zero Watch seeks to inform policymakers and the public about the challenges and opportunities associated with net-zero objectives.
2. In connection with Net Zero Watch’s ‘Net Zero and Liberty’ project, you previously prepared a one-off paper on the effect of net zero policies on liberty in the UK. You stated in this proposed role as Consultant, Net Zero Watch wishes to engage you to:
  - help in the production of a video to promote the project.
  - visit the USA with Net Zero Watch staff to promote the project outputs in the Autumn.
3. You stated that your role will not involve contact with government.

#### Correspondence with Net Zero Watch

4. Net Zero Watch confirmed in writing its agreement to comply with the Committee's advice and that your role will not involve contact with, or lobbying of government.

#### Dealings in office

5. Of your time in office, you stated Net Zero Watch has no relationship with your former departments and:
  - you did not make any policy, commercial or regulatory decisions specific to Net Zero Watch;
  - you did not have any contact with Net Zero Watch; and
  - you do not have access to sensitive information through your recent ministerial role that could grant Net Zero Watch an unfair advantage.

#### Departmental assessment

6. The NIO stated in January 2023, it received a media query noting that you had accepted a £10,000 donation from Neil Record. Mr Record is the Chair of Net Zero Watch. This donation was made by Mr Record as a private individual and declared in your parliamentary register of interests in January 2023, in your capacity as an MP – not as a minister.
7. The NIO and the Cabinet Office confirmed you were not involved in decisions specific to Net Zero during your time in office, with the departments flagging you were not involved in any action beneficial to the organisation taken in your ministerial capacity.
8. The NIO and the Cabinet Office do not consider you possess sensitive information that is likely to provide an unfair advantage to Net Zero Watch.
9. The departments do not have concerns with your appointment and recommended the standard conditions apply.