

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Baroness Olivia Bloomfield of Hinton Waldrist, former Government Whip, House of Lords. Paid appointment with Titanvolt 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 an appointment you wish to take up with Titanvolt Limited (Titanvolt) as a Consultant.
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 and influence you may offer Titanvolt. 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. You did not make any policy, regulatory or commercial decisions specific to Titanvolt whilst in office; nor did you meet with the company. Therefore, the Committee¹ determined that the risk you were offered the role as a reward for your actions taken in office, is low.
6. As a former minister, there are risks associated with your access to privileged information. In particular, your role as Government Whip included working with the department responsible for energy more widely (the Department for Energy Security & Net Zero) in relation to promoting and defending its policies in the House of Lords. However, the Cabinet Office said you did not have access to any specific information that could provide an unfair advantage to Titanvolt. Further, you have been out of office for over 17 months, creating a gap between your access to information and your role with Titanvolt.
7. There is a risk that your network and influence within government might be used to offer the Titanvolt unfair access to government. This is particularly relevant given that Titanvolt is a new company, likely to have an interest in government policies and regulation of the UK's battery strategy and planning permissions. It would be improper for you to offer access to government for Titanvolt as a result of your time in office, as the two year lobbying ban under the Rules sets out.

The Committee's advice

8. The conditions below make it clear you must not make use of your access to privileged information, contacts or influence gained from your time in ministerial office to the unfair benefit of Titanvolt. The Committee considered these conditions appropriately mitigate the risks identified above.
9. The Committee advises, under the government's Business Appointment Rules, that your role with **Titanvolt Limited** should 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 office, you should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of Titanvolt Limited (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your

¹ This application for advice was considered by Andrew Cumpsty; Isabel Doherty; Hedley Finn OBE; Sarah de Gay; Dawid Konotey-Ahulu CBE DL; The Rt Hon Lord Eric Pickles; Michael Prescott; and Mike Weir.

contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Titanvolt Limited (including parent companies, subsidiaries, partners and clients); and

- for two years from your last day in ministerial office, you should not provide advice to Titanvolt Limited (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 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.² You are reminded that as a Member of the House of Lords you are prevented from any paid lobbying under the House of Lords 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.
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 Civil Service Code or otherwise.
12. 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."*
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. Please 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.

² All Peers and Members of Parliament are prevented from paid lobbying under the the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your 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.

14. 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.

The Rt Hon Lord Pickles

Annex - Material Information

The role

1. According to its website, Titanvolt is a battery management systems company based in the UK pioneering in next-generation energy storage with advanced Lithium Titanate Oxide (LTO) batteries that are safe, sustainable and more efficient. Titanvolt has secured exclusive rights to an LTO battery design and IP from the South Korean lithium-ion rechargeable battery and battery management systems company, Grinergy. Titanvolt is now proposing future production and sale of Lithium Titanate Batteries in the UK for use in a variety of settings, including domestic energy storage to heavy earthmoving equipment for mining. The company plans to penetrate the domestic battery market and eventually build a manufacturing base in the UK. Titanvolt has links to the energy, defence, residential and construction industry sectors.
2. In your (paid) role as Consultant, you stated responsibilities involve:
 - helping to build a team
 - scoping out electricity suppliers (e.g. OVO Octopus, SSE, etc.) to design a battery for the home heating market.
 - potentially advising on a possible site for manufacturing batteries.
 - no contact with or lobbying of government

Dealings in office

3. You informed the Committee that you did not meet with, nor were you involved in, policy, commercial or regulatory decisions specific to Titanvolt. Further you said you have no sensitive information specific to the company.

Departmental assessment

4. The Cabinet Office confirmed the details you provided, stating:
 - you were not involved in decisions specific to Titanvolt;
 - you did not meet with Titanvolt whilst in office, nor does the department hold a relationship with the company;

- it does not consider you to possess sensitive information specific to Titanvolt which may confer an unfair advantage.
5. The Cabinet Office did not have concerns with the appointment and recommended the standard conditions.