

OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ
Telephone: 020 7271 0839
Email: acoba@acoba.gov.uk
Website: http://www.gov.uk/acoba

November 2024

BUSINESS APPOINTMENT APPLICATION: The Rt Hon Steve Baker FRSA, former Minister of State at the Northern Ireland Office and Cabinet Office. Paid appointment with Home@ix Limited.

- You approached the Advisory Committee on Business Appointments the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as Non-Executive Director at Home@ix Limited.
- 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 Home@ix Limited. 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 said that you made no decisions specific to Home@ix Limited, nor did you meet with the company whilst in office. Therefore, the Committee¹ considered

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

- the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
- 6. There is no particular overlap between your role as Minister of State at the Northern Ireland Office and the Cabinet Office and your proposed appointment with Home@ix. As a former minister, you will have had access to general sensitive information that could benefit many organisations, including Home@ix Limited though your former departments are not aware of anything specific that would offer an unfair advantage. It is significant that you have been out of office for over four months, limiting the currency of the information you had access to.
- 7. As a former minister, your contacts and influence across government could offer Home@ix Limited an unfair advantage. You confirmed that your proposed role would not involve any contact with government.

The Committee's advice

- 8. 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 Home@ix Limited.
- 9. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Home@ix Limited** 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 nor its arm's length bodies
 on behalf of Home@ix Limited; 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 Home@ix Limited;
 and
- for two years from your last day in ministerial office you should not undertake any work with Home@ix Limited 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' Interests². 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 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 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.
- 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. You stated that Home@ix Limited's aim is to transform the housing market by linking real estate development with climate action and sustainable choices

² 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.

through a pioneering platform that converts carbon emission reductions into tangible financial savings, making sustainable living more accessible and rewarding.

- 2. As a paid Non-Executive Director you stated you would provide a creative contribution to the board by providing independent oversight and constructive challenge to the executive directors.
- 3. You confirmed your role will not involve lobbying government.

Dealings in office

- 4. You confirmed that you had no dealings with Home@ix Limited in your last two years in office, nor official dealings with Home@ix Limited's competitors nor the sector in which they operate.
- 5. You confirmed you are not aware of any relationship, either contractual or non-contractual, between you Home@ix Limited and your former department.

Departmental Assessment

6. The NIO and the Cabinet Office confirmed the details you provided and recommended the standard conditions.