



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

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**BUSINESS APPOINTMENT APPLICATION: The Viscount Camrose, former Parliamentary Under Secretary of State (Minister for Artificial Intelligence and Intellectual Property) for the Department for Science, Innovation and Technology. Paid appointment with AquaPulse Intelligence Limited.**

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 role as Chairman with AquaPulse Intelligence Limited (AquaPulse).
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 AquaPulse, as a former minister. 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. There is no known overlap with your ministerial portfolio and the role or work of AquaPulse. You did not meet with, nor were you involved in, policy, regulatory or commercial decisions specific to AquaPulse. Therefore, the

Committee<sup>1</sup> considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.

6. Whilst AquaPulse makes use of intelligence systems, there is no direct overlap with your responsibilities as Minister for Artificial Intelligence and Intellectual Property. The Department of Science, Innovation and Technology (DSIT) confirmed that it does not consider you to possess sensitive information that could provide an unfair advantage to AquaPulse. The risks relating to your access to information is general, as it would relate to any such company, as opposed to being specific to Aquapulse.
7. As with any former minister, there are risks associated with your contacts and influence within government – with the potential for AquaPulse to gain unfair access or influence as a result. You confirmed your role as Chairman excludes any dealings with government, reducing the risk that you could be perceived to be lobbying government, which all former ministers are prevented from doing for two years after leaving office.

#### The Committee's advice

8. The Committee determined that the risks identified in this application 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 office to the unfair advantage of AquaPulse.
9. The Committee advises, under the government's Business Appointment Rules, that your appointment with **AquaPulse Intelligence 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 service;
  - for two years from your last day in ministerial office, you should not become personally involved in lobbying government or any of its arm's length bodies on behalf of AquaPulse Intelligence Limited (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 AquaPulse Intelligence Limited (including parent companies, subsidiaries, partners and clients); and

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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; The Baroness Thornton; and Michael Prescott.

- for two years from your last day in ministerial office, you should not provide advice to AquaPulse Intelligence 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 and 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>2</sup>. 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 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. 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.
  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.

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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.

Isabel Doverty

**Interim Chair  
ACOB**

## **Annex – Material Information**

### The role

1. AquaPulse was incorporated in March 2025 under the '*engineering-related scientific and technical consulting activities*' classification. According to its website, AquaPulse delivers solutions for clients around underwater navigation and intelligence systems using GPS/coastal surveillance systems.

You stated that AquaPulse:

- utilises a new application of existing GPS technology;
  - will advise owners of offshore installations such as windfarms in the usage of AquaPulse's product. In addition they will place physical sensors underseas to monitor a range of variables (temperature, chlorophyll, salinity, etc). This will be analysed by Artificial Intelligence to provide insights into predictive maintenance; and
  - will target the audience and clients who are offshore installation owners, windfarms and other platforms, including private clients who will be able to reduce insurance premiums and maintenance costs.
2. You stated your role as Chairman is part-time and unpaid unless and until AquaPulse are able to raise funding. From that point, you expect to be remunerated.
  3. As Chairman, you stated you will provide strategic guidance and steering for the company and manage AquaPulse's board.
  4. You confirmed your role will not involve contact with government.

### Dealings in office

5. Of your time in office, you stated that AquaPulse has no relationship with DSIT and:
  - you did not make any policy, commercial or regulatory decisions specific to AquaPulse;
  - you did not have any contact with AquaPulse; and
  - you did not have access to sensitive information that could grant AquaPulse an unfair advantage.

### Departmental assessment

6. DSIT confirmed the details you provided, noting:

- you did not meet with, nor were you involved in decisions specific to AquaPulse during your time in office; and
  - the department does not consider you to possess sensitive information specific to the company that may provide an unfair advantage.
7. DSIT noted that AquaPulse's end customers are not known, and recommended the standard conditions.