

*From the Chair*



**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) in the Department for Science, Innovation and Technology. Paid commission with Vortexia Ltd under your independent consultancy (Camrose Management Ltd).**

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) on taking up a commission with Vortexia Ltd (Vortexia) under your independent consultancy, Camrose Management Ltd.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions you made during your time in office, alongside the information and influence you may offer your potential clients. 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 Rules<sup>1</sup> set out that former ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers 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

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<sup>1</sup> Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code.

5. The Committee<sup>2</sup> considered this commission to be broadly consistent with the description of your consultancy – offering technology advisory and business development services.
6. There is no relationship between Vortexia and your former department and you did not meet with, nor were you involved in any decisions specific to Vortexia whilst you were in office. Therefore, the Committee considered there is limited risk that this commission can reasonably be perceived as a reward for decisions made in office.
7. The Committee recognised as the Minister for Artificial Intelligence and Intellectual Property, you had access to information that could overlap with this work. This risk is limited given your former department, the Department for Science, Innovation and Technology (DSIT) confirmed that any decisions you were involved in are in the public domain and any ongoing matters have since moved on sufficiently to reduce the risk. Further, it has been over six months since you last had access to information and DSIT does not consider you to possess sensitive information and insight that could offer Vortexia an unfair advantage.
8. Given your ministerial profile as the former Minister for Artificial Intelligence and Intellectual Property, there is a risk of a perception that your network and influence within government may unfairly advantage Vortexia. As your commission with Vortexia involves business strategy and development, there is a risk that any contacts you may have developed whilst in office could be used to gain business for the company.

### **The Committee's advice**

9. 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 or influence gained from your time in ministerial service to the unfair advantage of Vortexia under your independent consultancy, Camrose Management Ltd.
10. Additionally, the Committee imposed a restriction on lobbying contacts you made during your time in office in other governments and organisations outside of the UK government for the purpose of securing business for Vortexia.

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<sup>2</sup> This application for advice was considered by Andrew Cumpsty; Isabel Doherty; Sarah de Gay; Hedley Finn OBE; The Rt Hon Lord Pickles; Michael Prescott and Mike Weir. Baroness Thornton and Dawid Konotey-Ahulu CBE DL were unavailable.

11. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this commission with **Vortexia Ltd**, should be subject to the same conditions applied to your independent consultancy, Camrose Management Ltd:

- you should not draw on (disclose for 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 any of its arm's length bodies on behalf of Vortexia Ltd (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial office contacts to influence policy, secure business/funding or otherwise unfairly advantage Vortexia Ltd (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to or on behalf of Vortexia Ltd (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 any of its arm's length bodies;
- for two years since your last day in ministerial service, you should not become personally involved in lobbying contacts you developed during your time in office in other governments and organisations for the purpose of securing business for Vortexia Ltd; and
- for two years from your last day in ministerial office, before accepting any commissions for Camrose Management Ltd and or/before extending or otherwise changing the nature of your commissions, you should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.

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>. You are reminded that as a Member of the

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<sup>3</sup> All Peers and Members of Parliament are prevented from paid lobbying under the House of

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.

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 Ministerial Code or otherwise.
14. 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".
15. 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.
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.

**The Rt Hon Lord Pickles**

## **Annex – Material Information**

### The role

1. You stated that Vortexia is a new organisation, working in Augmented/ Virtual reality, particularly for sports and concerts.

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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.

2. You stated this is a commission under Camrose Management Ltd which will be advising on technology advisory and business development. You said you will be advising Vortexia on:
  - business strategy
  - tech strategy
  - business development
  - you confirmed your commission will not involve contact with government.

#### Dealings in office

3. You advised the Committee that you were not involved in decisions, nor had access to sensitive information specific to Vortexia.
4. You stated as Minister for Artificial Intelligence and Intellectual Property, you:
  - had extensive dealings with the tech sector. This included tech businesses of all sizes, operating in both hardware and software.
  - you also met regularly with industry bodies and arms' length bodies (Tech UK, Alan Turing Institute etc.) All such meetings were attended and minuted by civil servants in DSIT.

#### Departmental assessment

5. DSIT confirmed the details in your application, including that you made no decisions specific to the company, nor do you have access to information that would offer an unfair advantage.
6. DSIT separately noted it has been over six months since you had access to information as minister. Further, policy decisions you were involved in have since been published and any remaining matters have been superseded by new policy direction by the current government – including AI regulation.
7. DSIT did not have concerns with this commission and recommended the standard conditions apply.