



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Tom Tugendhat MBE VR MP, former Minister of State for Security, the Home Office. Application to be a Script Writer and Presenter (self-employed).

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) seeking advice on writing scripts for documentary and film-making purposes that could lead to opportunities in presenting.
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. 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 will write scripts to pitch for documentary and film-making purposes, which could lead to opportunities in presenting. You stated that though the topics you will cover have not yet been finalised, this may include

matters around European defence. You will not be working under any agency or company, but rather on a self-employed basis.

6. The Home Office confirmed that you did not have involvement in any decisions that would be relevant to this role. The Committee¹ considered the risk that this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
7. As a former minister, there are inherent risks associated with your privileged access to information and contacts which may be seen to be of general use to your own work and any media entity that may seek to use it. These risks are limited given the potential public and transparent nature of this role. Further, you have been out of office for over one year and will not have contact with government in this role.

The Committee's advice

8. The Committee did not consider that this appointment raises any propriety concerns under the government's Rules, provided it is subject to standard conditions which prevent improper use of information and influence.
9. It is an individual's responsibility to manage the propriety of the specific pieces of work undertaken. In particular, you must be careful not to offer any unfair insight as a result of your access to information and potential influence in government - which the conditions below seek to mitigate.
10. In accordance with the government's Business Appointment Rules, the Committee advises your role as a **self-employed script writer and presenter** be subject to the following conditions:
 - you should not draw on (disclose or use for the benefit of yourself or those you work with) 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 its arm's length bodies in your role; 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 those you work with (including parent companies, subsidiaries, partners and clients); and

¹ This application for advice was considered by Sarah de Gay; Isabel Doverty; Hedley Finn OBE; Dawid Konotey-Ahulu CBE DL; Michael Prescott; and The Baroness Thornton.

- for two years from your last day in ministerial office, you should not undertake any work 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.
11. 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 Parliament you have a separate ban on paid lobbying under the Parliamentary 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.
 12. 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.
 13. 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*'. This Rule is separate and not a replacement for the Rules in the House.
 14. You must inform us as soon as you start this work, 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.
 15. 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.

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 your obligations under the Code can be sought from the Parliamentary Commissioner for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

Isabel Doverty

**Interim Chair
ACOPA**

Annex - Material Information

The role

1. You informed the Committee that you wish to write and pitch scripts for documentary and film-making purposes, which if successful could lead to opportunities in presenting. You will be working on a self-employed basis. You have not yet confirmed the scope of the topics which you intend to cover, but this may include matters such as European defence. You confirmed your role will not involve contact with the UK government.

Dealings in office

2. You stated that you did not make any relevant decisions, nor do you have access to relevant sensitive information for the purposes of this role.

Department Assessment

3. The Home Office confirmed the details you provided and recommended the standard conditions be applied.