

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Michelle Donelan, former Secretary of State for Science, Innovation, and Technology. Paid appointment with PUBLIC.

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 taking up a paid appointment with PUBLIC as an Advisor.
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 PUBLIC 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. PUBLIC is an advisory firm which states it works with public and private sector organisations to transform how they provide services to citizens. It operates

across a number of sectors, including security and online safety, wherein it works with '*clients across central government, regulatory bodies and industry to build safer online spaces, protect users and grow a responsible digital economy.*' It also advises startups on how to understand government procurement processes, navigate regulations, and develop solutions relevant to public services. Its website states that it has worked with numerous government departments, including the Department for Science, Innovation and Technology (DSIT), the Ministry of Justice and the Ministry of Defence.

6. You said that your role as an advisor would include, among other things, providing communications and marketing advice; skills advice – identifying skills gaps and devising the best strategies to address them; and supporting staff training, coaching and mentoring. You also said that you would not be advising on any policy areas that fall under DSIT's remit, such as AI and online safety.
7. As Secretary of State, first for Digital, Culture, Media and Sport (DCMS) and then Science, Innovation and Technology, you were responsible for the overall approach to AI across government. PUBLIC has a commercial interest in this area and successfully bid for several contracts for a range of work within GO-Science¹ and in security and online harms matters, whilst you were at DCMS and then DSIT. Whilst you were the Secretary of State with overall responsibility, DSIT confirmed there was no evidence you made decisions in respect of PUBLIC's contracts. In the circumstances, the Committee² considered the risk this role could reasonably be perceived as a reward for decisions made or actions taken in office is limited.
8. As a former Secretary of State and Cabinet Minister, you would have had access to a broad range of information from across government that could grant any company, including PUBLIC, an unfair advantage. Whilst DSIT was unable to point to any specific information that is of particular sensitivity, it noted that you did have access to general information relating to online harms/protections/safety that could be commercially valuable to PUBLIC; though it is likely the currency of this information will have reduced in the 11 and a half months since you left office. This risk is most likely to arise should you be asked to advise PUBLIC or its clients on the areas for which you had responsibility in office. This risk is heightened given that PUBLIC is known to operate in areas that do overlap with your ministerial portfolio, including the online safety and AI spaces. It is significant that you plan to avoid advising in any areas that overlap with your portfolio, and PUBLIC has confirmed your role will not involve working on policy or operational

¹ GO-Science stands for The Government Office for Science. It is operationally independent and works across all of Government. For administrative purposes it is part of the Department for Science, Innovation and Technology.

² This application for advice was considered by Sarah De Gay; Isabel Doverty; Hedley Finn OBE; Michael Prescott; and the Baroness Thornton.

matters that overlap with your recent ministerial portfolio.

9. There is a risk that your influence and contacts within government could be perceived to benefit PUBLIC unfairly. This is because PUBLIC has a clear interest in government policy and contracts. The Committee notes that your role will not involve contact with government.

The Committee's advice

10. There are risks under the Rules associated with the potential for your responsibilities as Secretary of State for Science, Innovation and Technology to conflict with the advice you may be asked to provide at PUBLIC. The Committee is mindful that your time out of office means your access to up to date information is limited. To deal with the risks around PUBLIC's unknown clients the Committee has imposed an additional condition that prevents you from advising on matters that overlap with your ministerial role, or where you had a material relationship with the client in office.
11. Further, on the basis that PUBLIC advises companies on how to navigate the government procurement process, the Committee's advice is that you should have no direct engagement with the UK government while you are subject to the Rules. Whilst it is not your intention to advise on this topic, and you are prevented from doing so by the standard conditions below, it would be difficult, were you to have any contact, to manage the risks of a reasonable perception of lobbying. As such, the Committee's advice is that you should not have contact with the UK government on behalf of PUBLIC or its clients.
12. It is significant that PUBLIC has provided confirmation that these conditions will be adhered to; and specifically that your role will not involve: lobbying or contact with the UK government, nor matters that overlap directly with your most recent ministerial role.
13. The Committee considered that the remaining risks in this application can be appropriately mitigated by the conditions below. These seek to prevent you from making improper use of privileged information, contacts and your influence to the company's unfair advantage.
14. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **PUBLIC** 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 or any of its arm's length bodies on behalf of PUBLIC (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 to influence policy, secure business/funding or otherwise unfairly advantage PUBLIC (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 PUBLIC (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 from your last day in ministerial office, you should not advise PUBLIC or its clients on policy or operational matters you had responsibility for as Secretary of State for Science, Innovation and Technology, or where you had a relationship with the relevant client during your time as Secretary of State for Science, Innovation and Technology; and
 - for two years from your last day in ministerial office, you should not have any direct contact with the UK government on behalf of PUBLIC (including parent companies, subsidiaries, partners and clients).
15. 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.³ 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.
16. 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.
17. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/minister *'should not engage in communication with*

³ 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.

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.’

18. You must inform us as soon as you take up employment with PUBLIC, 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.
19. 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.

Isabel Doherty

**Interim Chair
ACOPA**

Annex – Material Information

The role

1. PUBLIC is an agency that helps primarily public sector bodies transform how they provide services to citizens. It positions itself as a facilitator and enabler of public sector innovation. Its main purpose is to connect tech companies with government needs. It acts as an intermediary, helping innovative startups understand government procurement processes, navigate regulations, and develop solutions relevant to public services. Its website states that it has worked with and for numerous government departments and the wider public sector. It operates in the following areas:
 - a. Security and Online Safety
 - b. Learning and Workforce Transformation
 - c. Commercial, Spend and Impact
 - d. Digital, Data and Technology
2. DSIT is responsible for driving innovation in the UK, including within public services, and for developing the digital infrastructure – it has previously had contracts with PUBLIC. HMG is also committed to digital transformation and improving public services through technology – aiming to reduce reliance on outsourcing and work in partnership with industry to bring in innovation.
3. You seek to take a paid, part-time role as an Advisor. You said that your role would involve advising on the following:
 - a. Communications and marketing advice, in which you gained experience prior to entering politics and government.
 - b. Supporting staff training, coaching and mentoring, including how to manage fast paced high stakes decision making and crisis management.
 - c. Skills advice – identifying skills gaps and devising the best strategies to address them to help PUBLIC as an agency, local authorities, third sector organisations and businesses develop their skills offering and navigate the options.
4. You said that your role would cover topics within the remit of culture, media and sport – knowledge you gained from your role as Secretary of State for Digital, Culture, Media and Sport. You also provided the following information about what your role will not entail:
 - a. You will not work on any policy areas that overlap with DSIT's portfolio
 - b. You will not lobby government
 - c. You will not have any contact with government
 - d. You will not be working on anything relating to government, as the role is about coaching and working with private businesses

- e. You will not work with any large tech companies (such as Meta, Apple, Amazon, with whom you met in office in discharge of your ministerial duties⁴)
- f. You will not work on anything relating to AI or misinformation.

Correspondence with PUBLIC

- 5. PUBLIC was asked to confirm, in writing, that the conditions in this letter will be adhered to. PUBLIC said the following about your role:
 - a. it will not involve any lobbying;
 - b. it will be internal-facing as regards government and therefore no contact with UK government;
 - c. you will not advise on bids or contracts with government for PUBLIC;
 - d. you will not advise on policy or operational matters that overlap with your time as the Secretary of State for Science, Technology and Innovation.

Dealings in office

- 6. You told the Committee the following information about your time as Secretary of State for Science, Innovation and Technology:
 - a. You had no access to sensitive information that could grant an unfair advantage.
 - b. You had no contact with PUBLIC in office.
 - c. You did not know whether PUBLIC had any contracts with DSIT, but believed that any such contact would have come about after you left office.
 - d. You did not make any policy, regulatory, operational or commercial decisions specific to PUBLIC.

Departmental assessment

- 7. DSIT provided the following information about your tenure as Secretary of State:
 - a. Decisions – you did not make any decisions specific to PUBLIC. However, as Secretary of State you advocated for stronger online safety regulations. DSIT's view was that PUBLIC benefited as it offered consultancy with this policy area. It said that PUBLIC undertook a broad range of work across the spectrum of the Security and Online Harms directorate's work whilst the directorate was situated within DCMS (before DCMS split to become DCMS and DSIT, and you moved to be Secretary of State at DSIT). However, DSIT noted that there was no evidence that you were involved in awarding these contracts to PUBLIC.
 - b. DSIT also said that the transformational role of AI will play a significant role in government transformation (PUBLIC's focus) and that you were responsible for the overall approach to AI across government. This

⁴ www.gov.uk/government/collections/dsit-ministerial-gifts-hospitality-travel-and-meetings

predominantly showed itself through the AI Safety Institute⁵ work. DSIT noted that PUBLIC does not appear to have been a key stakeholder in that work.

- c. Contact in office – DSIT said that your private office had contact with PUBLIC while you were in office. It said that:
 - i. your office invited PUBLIC’s CEO to attend stakeholder events such as the AI Safety summit⁶ and stakeholder panels;
 - ii. emails were sent either from the Secretary of State’s inbox or via the Permanent Secretary to let the CEO of PUBLIC know about significant fiscal events e.g. the March moment in 2023 and the Budget;
 - iii. PUBLIC invited you to join the GovTechSummit 2023 as a keynote speaker. This was instead attended by representatives of the Central Digital and Data Office,⁷ and not by yourself.
- d. DSIT said that this engagement was consistent with the approach applied to a significant range of companies and did not represent regular or close engagement with the firm.
- e. Departmental relationship – DSIT said that it does not currently have a commercial relationship with PUBLIC. However, it said that there were contracts in place at the time you were in post, though made clear that you did not make the decision to award these contracts – which sat with the Security and Online Harms directorate and GO-Science. The contracts were as follows:
 - i. Safety Tech Challenge Fund Evaluator 2 – £37,635.00⁸
 - ii. DSIT – Online Safety Act Baseline Research: Terms of Service and Transparency Reporting – £49,544.00
 - iii. DDaT22594 – Global EmTech Discovery – £244,700.00
 - iv. Online Safety Bill – Monitoring and Evaluation Framework – £231,655.00

⁵ The AI Safety Summit was an international conference discussing the safety and regulation of artificial intelligence. It was held at Bletchley Park, Milton Keynes, United Kingdom, on 1–2 November 2023. It was the first ever global summit on artificial intelligence, and is planned to become a recurring event: www.gov.uk/government/topical-events/ai-safety-summit-2023

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⁷ The Central Digital and Data Office (CDDO) was a UK government body focused on leading the digital transformation of government through the Digital, Data and Technology function. It aimed to improve government services by leveraging technology and data, and was part of DSIT. In January 2025, CDDO merged with the Government Digital Service to form a new, unified Government Digital Service.

⁸ An independent evaluation of the second round of the Safety Tech Challenge Fund, which focused on tackling link sharing of child sexual abuse material: www.gov.uk/government/publications/safety-tech-challenge-fund-round-2-evaluation

- v. Research: Platform Design and Online Violence Against Women and Girls (VAWG)⁹
 - f. Access to information – DSIT said that you were involved in the Online Safety Bill and areas relating to online safety as well as AI. Should PUBLIC wish to work with DSIT in these areas, this knowledge could be considered to offer an unfair insight/advantage to PUBLIC. This is a generalised risk. DSIT did not note any specific topics that could grant an unfair advantage over others.
- 8. DSIT recommended the standard conditions plus a limitation to your role to prevent you from working on areas that you worked on at DSIT.

⁹ www.gov.uk/government/publications/platform-design-and-the-risk-of-online-violence-against-women-and-girls