



**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](mailto:acoba@acoba.gov.uk)

Website: [www.gov.uk/acoba](http://www.gov.uk/acoba)

September 2025

**BUSINESS APPOINTMENT APPLICATION: The Rt Hon Robert Halfon, former Minister of State for Skills, Apprenticeships and Higher Education for the Department for Education. Paid appointment with Make UK.**

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 paid role as Executive Director for External Affairs, Make UK.
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 Make UK. 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. Make UK is both a membership body that represents the manufacturing industry, and an education provider for courses, apprenticeships and apprenticeship training.

6. The Committee<sup>1</sup> took into consideration that you previously received advice on advising Make UK as Co-Chair of the Industrial Skills Commission<sup>2</sup>. This proposed appointment as Director of External Affairs will involve leading on engagement with Make UK members who are largely manufacturing businesses.
7. Having consulted your former department, the Department for Education (DfE), its view remained that: whilst you made broad decisions affecting the apprenticeships and skills sectors as a whole, you made none specific to Make UK. Therefore, the Committee's view remains that the risk this role could reasonably be seen as a reward for decisions made or actions taken in office is limited.
8. Your former role in office raises a reasonable risk that you could have had access to information across the skills and apprenticeships sector, which may be relevant to Make UK as a training, apprenticeships and education provider. This risk is limited as:
  - DfE said that you did not have access to information that would grant Make UK an unfair advantage;
  - none of the information to which you had access was specific to the manufacturing sector in which Make UK operates; and
  - you have been out of office for over 16 months, which places a significant gap between when you last had access to sensitive information and your proposed appointment with Make UK.
9. Make UK has a clear, ongoing interest in government policy and spending on skills and apprenticeships generally, as evidenced by its lobbying of HM Treasury to fund the Growth Sector Pilots. As Director of External Affairs, there is therefore a reasonable risk that your role may be seen to be lobbying on behalf of the organisation. It is significant that you said that your role will not involve lobbying or contact with government, and that this has been confirmed by Make UK.

#### The Committee's advice

10. The main risk in this case is that your role may be perceived as lobbying government on Make UK's behalf, particularly as Make UK is a membership body that promotes the interest of its members to the government. The Committee's advice is that you should have no direct engagement with the government on behalf of Make UK. The Committee considered it significant that both you and Make UK provided confirmation of separation of your duties from

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

<sup>2</sup> [www.gov.uk/government/publications/halfon-robert-minister-of-state-for-skills-apprenticeships-and-higher-education-department-for-education-acoba-advice](https://www.gov.uk/government/publications/halfon-robert-minister-of-state-for-skills-apprenticeships-and-higher-education-department-for-education-acoba-advice)

any lobbying of government and involvement in any of Make UK's operations with government.

11. The remaining risks are appropriately mitigated by the conditions below, which seek to prevent you from making improper use of privileged information, influence and contacts gained from your time in ministerial office, for the unfair advantage of Make UK, its clients, stakeholders and its members.

12. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Make UK** 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 Make UK (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 Make UK (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, Make UK (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 initiate any engagement on behalf of Make UK (including parent companies, subsidiaries, partners and clients) with the UK government.

13. 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> 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.

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<sup>3</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.

14. 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.
15. 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.'*
16. 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 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.
17. 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 Doverly

**Interim Chair  
ACOBA**

## **Annex – Material information**

### The Role

1. Make UK is a membership body representing the manufacturing industry. It offers learning in the form of educational courses, apprenticeship training for employers, and apprenticeships.
2. Make UK was involved in HMG stakeholder engagement in 2024, prior to the autumn budget, about Growth Sector Pilots – a £50 million pilot to stimulate apprenticeships in engineering and other growth sectors with skills deficits.<sup>4</sup>
3. In your paid, part-time role as Director of External Affairs, you stated you will be leading engagement with Make UK members who are largely external manufacturing businesses.
4. You stated that the role will not involve any lobbying of, or contact with government.

### Correspondence with Make UK

5. Make UK confirmed in writing its understanding of, and agreement to comply with, the Committee's advice. The CEO of Make UK confirmed your role will not involve lobbying of the UK government and your duties will be separated from Make UK's lobbying activities.

### Dealings in office

6. You informed the Committee that:
  - you did make decisions affecting the apprenticeships and skills sectors as a whole, but none that specifically impacted Make UK.
  - you had a stakeholder meeting with the CEO of Make UK in September 2023, but no decisions arose from this meeting.
  - Make UK is a key stakeholder of DfE as a skills, education and apprenticeships provider.
  - you did not have access to any sensitive information in office that could grant Make UK an unfair advantage.

### Departmental response

7. DfE confirmed the details in your application and added the following:
  - you had three stakeholder meetings with the CEO of Make UK in September 2023 and February 2024, and it confirmed that no decisions

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<sup>4</sup> [www.sctp.org.uk/two-year-apprenticeship-growth-pilot-launches-from-1-april-to-stimulate-training-in-13-high-value-standards/](http://www.sctp.org.uk/two-year-apprenticeship-growth-pilot-launches-from-1-april-to-stimulate-training-in-13-high-value-standards/) and [feweek.co.uk/autumn-statement-50m-pilot-for-growth-sector-apprenticeships/#:~:text=%E2%80%9CThe%20government%20is%20supporting%20plans,in%20high%2Dvalue%20standards.%E2%80%9D](http://feweek.co.uk/autumn-statement-50m-pilot-for-growth-sector-apprenticeships/#:~:text=%E2%80%9CThe%20government%20is%20supporting%20plans,in%20high%2Dvalue%20standards.%E2%80%9D)

arose from these meetings.

- Make UK is a trusted stakeholder engaged as part of policy development across skills
- decisions you made in office had an indirect impact to Make UK with none specifically impacting the organisation more than any other trade body with a focus on skills development.
- it does not consider you to possess sensitive information that provides an unfair advantage to Make UK.

8. DfE did not have concerns with the appointment and recommended the standard conditions.