



**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: <http://www.gov.uk/acoba>

September 2025

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

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 an Advisor with MAKERS.
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 MAKERS, 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. MAKERS is an AI technology provider, focused on education and upskilling for AI and technology. It also assists in placing its graduates in employment. It works with a range of private and public sector companies, including government (for example, the NHS, the Department for Work (DWP) and Pensions and the Department for Science, Innovation and Technology (DSIT)). You said that your role as an Advisor will be internal, not client-focused, to advise the board on the UK's education system and skills offering; how MAKERS can add value, based on the context of the current labour market needs; and supporting the organisation with communications and speeches on skills.
6. DSIT told the Committee<sup>1</sup> that you did make decisions on increasing the pool of AI talent, which would have impacted all companies operating in the AI skills sector, including MAKERS. It also said that you made decisions on the Flexible AI Upskilling Fund pilot,<sup>2</sup> which may have indirectly impacted MAKERS. DSIT said that while the pilot was launched while you were Secretary of State, all commercial aspects of the programme happened after you left office. It also stressed you made no policy, regulatory or commercial decisions that specifically impacted MAKERS.
7. MAKERS holds contracts with the Government Digital Service (GDS) to administer several programmes, including the Tech Track Apprenticeship.<sup>3</sup> GDS now sits under the purview of DSIT, but at the time you were in office and these contracts procured, it did not, and you had no involvement in the granting of these contracts.
8. While DSIT has made policy and commercial decisions impacting MAKERS you were not involved in them, nor did you have contact with MAKERS in office. As such, the Committee has determined that the risk that you were offered a reward for decisions or actions taken in office is low.
9. As Secretary of State for Science, Innovation and Technology, you were exposed to a wide range of information that could benefit any AI technology company, including MAKERS. However, this role has limited subject matter overlap with your time in office. The Committee considered this risk is limited because DSIT said that you did not have access to any information that would grant MAKERS an unfair advantage; and that any relevant policies have moved on within the 14 months since you left office and last had access to information.

---

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

<sup>2</sup> <https://www.gov.uk/government/publications/flexible-ai-upskilling-fund>

<sup>3</sup>

<https://cddo.blog.gov.uk/2025/03/13/techtrack-revolutionising-digital-apprenticeships-in-the-civil-service/>

10. Given that MAKERS provides services in educating the government about AI, including to DSIT, there is a reasonable concern that you may be seen to offer the company unfair access to the government as a result of your privileged access to contacts and influence as the Secretary of State for Science, Innovation and Technology – the department which oversees AI regulation. The Committee considered it significant that MAKERS has a pre-existing relationship with government; and that MAKERS has confirmed that your role will be separated from all its activities related to government, and neither will it involve contact with government.

#### The Committee's advice

11. The Committee did not consider that this appointment raises any particular propriety concerns under the Rules. Whilst there are risks associated with your time in office, the Committee considers that these are mitigated by the conditions below. These seek to prevent you from drawing on privileged information, contacts and influence to the unfair advantage of MAKERS.

12. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **MAKERS** 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 MAKERS (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 MAKERS (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 MAKERS (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.

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>4</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.

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 Doverty

**Interim Chair  
ACOB**

---

<sup>4</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.

## **Annex – material information**

### The role

1. MAKERS is an EdTech AI company that provides educational programmes to upskill in AI and technology. It services businesses and individuals through skills programmes. It offers intensive tech programs including software engineering, data analytics, DevOps (Cloud), and test engineering. It is heavily invested in AI education, providing programs like 'AI Essentials' to help individuals and teams confidently adopt and integrate AI into their workflows. It also runs 'AI Labs' to share insights on deploying AI and managing risks. The curriculum is developed in-house by former tech engineers, blending technical skills with resilience training to cultivate 'curious problem solvers.'
2. It works with a range of private and public sector companies, including Google, Microsoft, Deloitte, HMG, Transport for London, Monzo and Compare the Market. It has a significant focus on working with the UK government, primarily through apprenticeship programs designed to upskill and reskill civil servants in critical digital and tech roles.
3. One of these is the TechTrack Programme: an initiative led by the GDS in partnership with MAKERS. It aims to address critical digital skills gaps across various government departments. The programme focuses on training and retaining a sustainable and diverse digital workforce within the Civil Service. TechTrack apprenticeships are offered for in-demand roles such as Software Developer, DevOps Engineer, Business Analyst, Cyber Security Technologist. The programme targets both existing civil servants who need to be retrained with new technical skills and new entrants looking to start a tech career in government.
4. MAKERS has directly partnered with various government departments, including the NHS and DWP, to deliver software development, DevOps, and quality engineering apprenticeship programmes. Its aim here is to address the technology skills gap in the civil service.
5. You wish to take up a paid, part-time, role as an Advisor. You said that your role would involve:
  - Participating on its Advisory Board.
  - Advising on the UK's education system and skills programme/offer and how MAKERS can add value to businesses and individuals, including companies and individuals looking for ways to reskill and upskill themselves or workforces, for the current and emerging economy and labour market needs.

- Supporting it with comms and speeches on skills.
- No contact with government.

6. MAKERS provided the following confirmation to the Committee:

- Your role will be separated from any of MAKERS' activities related to government;
- That you will not have any contact with government;
- That it understands the importance of the Committee's broader restrictions.

#### Dealings in office

7. You told the Committee the following information about your role as Secretary of State at DSIT:

- You did not make any policy, regulatory or commercial decisions specific to MAKERS.
- You did not have any contact with MAKERS in office.
- There is no departmental relationship between DSIT and MAKERS.
- You did not have access to any sensitive information that could grant MAKERS an unfair advantage.

#### Departmental assessment

8. DSIT confirmed:

- You made regular policy and regulatory decisions which affected many AI companies. These decisions are unlikely to have had any specific, concrete impact on MAKERS, given its focus on the education sector.
- You made regulatory and policy decisions to increase the AI talent pool that would have affected MAKERS' work, but noted that, under the new government, policies have moved on/changed. The decisions included:
  - Flexible AI Upskilling Fund pilot – supporting SMEs to deliver AI training to their employees
  - AI Skills for Business Framework – Launched alongside the Flexible AI Upskilling Fund to help businesses to grip the opportunities of AI, driving innovation and future-proofing their workforce
  - AI Opportunity Forum<sup>5</sup> – bringing together the expertise from key business leaders, such as Microsoft, Google, and Vodafone,

---

<sup>5</sup> The group was announced by the Prime Minister in January 2024, to facilitate discussions on how to ramp up AI adoption in the private sector. Michelle Donelan and Lord Petitgas convened companies to discuss the creation of a product that will inspire businesses to start using AI. There were three meetings. [www.gov.uk/government/news/ai-opportunity-forum-holds-penultimate-meeting](https://www.gov.uk/government/news/ai-opportunity-forum-holds-penultimate-meeting)

with a clear mission to boost the adoption of AI in the private sector<sup>6</sup> – which you chaired

- AI Playbook published in June 2024.<sup>7</sup>
- You did not have access to any sensitive information that could grant MAKERS an unfair advantage, and any information to which you did have access will have changed direction under the new administration. Any relevant information will now be in the public domain.
- You did not meet with MAKERS in office.
- There was communication between the AI Skills team and MAKERS about the Flexible AI Upskilling Fund pilot scheme when it was launching, but this was part of DSIT's overall promotion.
- There is a contractual relationship between DSIT and MAKERS:
  - C0300 Software Developer Apprenticeship £180,000
  - C2360 Tech track Apprenticeship Training – Dev Ops Engineer £8,075,000
  - C2634 Tech Track Apprenticeship Software – Developer £11,250,000There is no current engagement between MAKERS and the current Secretary's private office.
- MAKERS is DSIT's apprenticeship provider for the software developer and engineer apprenticeship programmes.<sup>8</sup> These contracts sit within the Government Digital Service (GDS).<sup>9</sup> At the time you were Secretary of State GDS was not part of DSIT, so you would not have been involved in the appointment of these contracts.
- You were involved in the set up of the Flexible AI Upskilling Fund pilot – a flexible AI upskilling fund to support SMEs to deliver AI training to their employees. The pilot did not directly fund training providers like MAKERS – it funded SMEs which then procured services from training providers, the latter of which DSIT only did some essential quality assurance over. DSIT did not source the training providers for the SMEs. These commercial decisions were made based on published guidance and ministers did not have sight of individual decisions – their involvement ended when the scheme was launched.
- DSIT noted that while the pilot launched under your tenure, all commercial aspects (grant funding to SMEs) happened post-election when you were no longer Secretary of State.

---

<sup>6</sup> A list of its appointees can be found here:

[www.techuk.org/resource/government-launches-new-ai-opportunity-forum.html](http://www.techuk.org/resource/government-launches-new-ai-opportunity-forum.html)

<sup>7</sup> [www.gov.uk/government/publications/ai-playbook-for-the-uk-government](http://www.gov.uk/government/publications/ai-playbook-for-the-uk-government)

<sup>8</sup> DevOps apprenticeship programmes equip individuals with the skills to streamline software development and IT operations, focusing on automation, cloud technologies, and continuous delivery. These apprenticeships typically involve practical, hands-on training, with apprentices working in live environments to gain experience with tools like Jenkins, Docker, and Kubernetes. The programmes often incorporate a blend of theoretical learning and real-world application, culminating in an End Point Assessment

<sup>9</sup> GDS is the digital centre of government. It serves the public, central government departments and the wider public sector. It sits within DSIT for administrative purposes.

9. DSIT recommended the standard conditions and noted the risks associated with a company who has a range of service users.