



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Elizabeth Perelman, former Director General, Public Service Reform & Efficiency and, prior to that, Principal Private Secretary to the Prime Minister at the Cabinet Office. Unpaid appointment with The Richmond Project.

1. Ms Perelman sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Crown Servants (the Rules) on an unpaid role she wishes to take up with The Richmond Project, as a Trustee.
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 Ms Perelman's time in office, alongside the information and influence she may offer The Richmond Project. 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 Rules¹ set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants 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

¹ 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. When considering this application, the Committee² took into account this appointment as Trustee is unpaid.³ Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of the government by considering the real and perceived risks associated with former Crown servants joining outside organisations. Those risks include using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions, or take action in office, in expectation of rewards on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. There are inherent risks associated with Ms Perelman's access to information, network of contacts and influence in government. These risks are limited by the unpaid nature of the role and the nature of this newly established charitable organisation.

The Committee's advice

7. The Committee did not consider this unpaid appointment raises any particular concerns under the government's Business Appointment Rule. The standard conditions below sufficiently mitigate the inherent risks. These seek to prevent Ms Perelman from making improper use of privileged information, contacts and influence to the unfair advantage of the organisation.
8. Therefore, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **The Richmond Project** be subject to the following conditions:
 - she should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time in Crown service;
 - for two years from her last day in Crown service, she should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of The Richmond Project (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage

² This application for advice was considered by Isabel Doverty; Hedley Finn OBE; Sarah de Gay; Dawid Konotey-Ahulu CBE DL; Michael Prescott; and The Baroness Thornton.

³By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

The Richmond Project (including parent companies, subsidiaries, partners and clients); and

- for two years from her last day in Crown service, she should not undertake any work with The Richmond Project (including parent companies, subsidiaries, partners and clients) 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.
9. The advice and the conditions under the government's Business Appointment Rules relate to her 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.⁴ 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.
 10. 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/Civil Service Code or otherwise.
 11. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant '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.'
 12. Ms Perelman must inform us as soon as she takes up employment with this organisation, or if it is announced that she will do so, and we will publish this letter on our website. She must inform us if she proposes to extend or otherwise change the nature of her role as, depending on the circumstances, it may be necessary for her to make a fresh application.
 13. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website

⁴ 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.

Yours sincerely,

Murray Hemley
Committee Secretariat

Annex – Material Information

The role

1. The Richmond Project is a newly established charity set up by Rishi Sunak and Akshata Murty. It will identify and support initiatives that drive social mobility by helping families break down barriers to numeracy.
2. Ms Perelman wishes to take up a part-time, unpaid role as a Trustee. Her role will involve providing strategic advice and overseeing the governance of the charity, and would not involve any contact with government.

Dealings in office

3. Ms Perelman said that she did not make any policy, regulatory or commercial decisions specific to the Richmond Project, that she did not have any access to information that could grant the Richmond Project an unfair advantage, and that there was no relationship between the Richmond Project and the Cabinet Office.

Departmental assessment

4. The Cabinet Office confirmed the details provided in her application, noting this is a newly established charitable organisation. It recommended the standard conditions.