



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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July 2025

BUSINESS APPOINTMENT APPLICATION: Mr Robert Courts KC, former Solicitor General at the Attorney General's Office. Application to establish Anchor Philanthropic Capital Limited with Mr Steve Baker FRSA and Mr Tom Pursglove.

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 Chief Executive Officer (CEO) of Anchor Philanthropic Capital Limited (AnchorPC) alongside Mr Steve Baker FRSA and Mr Tom Pursglove.
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 AnchorPC. 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. AnchorPC is a new company that you are setting up with Mr Steve Baker and Mr Tom Pursglove. The Attorney General's Office (AGO) identified no decisions you were involved in that could provide an unfair advantage to you establishing

AnchorPC. The Committee¹ considered the risk that you were offered this role as a reward for decisions or actions taken in post was low.

6. As a former minister, you would have had access to general sensitive information that could benefit many organisations, including AnchorPC. The AGO noted that, as the former Solicitor General, you would have had access to legally privileged information and insight that could offer clients of AnchorPC an unfair advantage. The AGO did not note any specific information that presents a risk and you are subject to the Law Officer's Convention. Any information you may possess is subject to legal professional privilege; and neither the existence nor content of any Law Officers' advice should be disclosed outside government without the Law Officers' explicit consent.
7. The risk regarding your access to information is greatest should you advise AnchorPC or its clients in relation to matters you had specific responsibility for - and especially so given that AnchorPC's clients and the specific work you will be asked to undertake are unknown.
8. As with any former minister, there are risks associated with your contacts and influence within government and the potential for AnchorPC to gain unfair access or influence as a result. Further, your role as CEO of AnchorPC excludes any dealings with government, in accordance with the lobbying ban that applies to all former ministers for two years after leaving office.
9. There are also risks associated with your network of contacts in external organisations gained whilst in ministerial office. As CEO, you stated you will lead the company and take overall responsibility for performance. There is therefore a risk of unfair advantage to AnchorPC, were you to draw specifically on private sector contacts that you only gained as a result of your role in office.

The Committee's advice

10. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information, contacts or influence gained from your time in ministerial service to the unfair advantage of AnchorPC. Alongside the standard conditions, to mitigate the risk associated with unknown clients, the Committee has imposed a restriction to prevent you from advising on work specifically overlapping with your recent ministerial role.

¹ 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.

11. Additionally, the Committee imposed a restriction on lobbying contacts you made during your time in office in other governments and organisations outside of the UK government for the purpose of securing business for AnchorPC.

12. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Anchor Philanthropic Capital Limited** 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 its arm's length bodies on behalf of Anchor Philanthropic Capital Limited (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Anchor Philanthropic Capital Limited (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office you should not undertake any work with Anchor Philanthropic Capital Limited (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;
- for two years since your last day in ministerial office, you should not advise Anchor Philanthropic Capital Limited (including parent companies, subsidiaries, partners and clients) on any policy you had specific involvement in or responsibility for as Solicitor General at the Attorney General's Office, nor where you had a relationship with the relevant client during your time in the role; and
- for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you have developed during your time in office and in other governments and/or external organisations for the purpose of securing business for Anchor Philanthropic Capital Limited (including parent companies, subsidiaries and partners).

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.² 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 Ministerial Code or otherwise.
15. The Business Appointment Rules explain that the restriction on lobbying means that you "*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 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**

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 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. You stated AnchorPC will facilitate the transfer of philanthropic capital from US-based donor-advised funds (DAFs) to recipients in the United Kingdom. The company will intermediate between DAFs in the USA and UK charities.
2. You noted that it will establish a UK-based entity to meet US tax law requirements and UK regulatory standards, acting as an intermediary to vet grantees, structure transactions, and provide oversight. The organisation aims to facilitate funding that may face obstacles due to regulatory uncertainty or administrative burden, enabling UK charities and public-purpose organisations to potentially access American philanthropic resources.
3. You stated that AnchorPC is a new joint venture involving Baker Strategy Ltd (a payment vehicle owned and controlled by the Rt Hon Steve Baker FRSA), Ascalane Partners Ltd³ and three other founders who are not Members of Parliament, nor subject to the Rules.
4. You stated you will, in this paid Chief Executive Office role, lead the company, taking overall responsibility for performance and day-to-day operations.
5. You stated your role will not involve contact with government.

Dealings in office

6. This is a new company you are establishing. You stated you did not have involvement in any policy, commercial or regulatory decisions, nor do you possess sensitive information that could unfairly advantage AnchorPC.

Departmental assessment

7. The AGO confirmed the details you provided and stated the following:
 - they did not have any concerns regarding decisions or policies made during your time in office that could provide an unfair advantage in you establishing AnchorPC; and
 - you had access to confidential and legally privileged information which if disclosed inappropriately could be considered to offer an unfair advantage to clients of AnchorPC.

³ An independent consultancy owned and controlled by Mr Robert Courts KC and Mr Tom Pursglove – on which ACOBA has advised. [The advice letter can be accessed here.](#)

8. The AGO recommended the standard conditions to appropriately mitigate the risk relating to the access and use of any sensitive information you may possess. The department also highlighted that:

'In addition to legal privilege, Law Officers' advice is subject to the Law Officers' Convention, which provides that neither the existence nor content of any Law Officers' advice should be disclosed outside government without the Law Officers' explicit consent.'