



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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**BUSINESS APPOINTMENT APPLICATION: Mr Tom Pursglove, former Minister of State for Legal Migration and the Border at the Home Office and, prior to that, Minister of State for Disabled People, Health and Work at the Department for Work and Pensions. Paid commission with CCL Solutions Group Ltd under your independent consultancy – Ascalane Partners Ltd.**

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 commission with CCL Solutions Group Ltd (CCL) under your independent consultancy, Ascalane Partners Ltd.
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 CCL. 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. The Committee<sup>1</sup> considered this commission to be broadly consistent with the description of your consultancy – providing strategic counsel to clients on

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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.

corporate strategy, strategic analysis, including on the broad political landscape and public policy as well as advising clients on other subject matters, as noted in the annex below.

6. CCL is a digital forensics, digital investigation, and cyber security specialist company. It supports law enforcement, governments, and public and private sector organisations in the recovery, examination, assessment and protection of data. The company states it works regularly with the National Crime Agency, the Metropolitan Police, UK regional forces and His Majesty's Revenue and Customs, as well as governments.
7. There is no known overlap between your proposed work with CCL and your recent ministerial roles at the Department for Work and Pensions (DWP) and the Home Office. During your time in office, you did not meet with CCL, nor were you involved in policy, regulatory or commercial decisions specific to the company. Therefore, the Committee considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office to be low.
8. As a former minister, it is likely that you had access to a broad range of sensitive information that may benefit any company, including CCL. The Home Office and DWP confirmed that they were not concerned about any specific information to which you had access that could offer an unfair advantage to the company. This is a general risk, but you have been out of office for over 12 months, putting a gap between your last access to information and you taking up this role, thereby reducing the likelihood it is sufficiently up to date to offer an unfair advantage.
9. As with any former minister, there are risks associated with your contacts and influence within government – with the potential for CCL to gain unfair access or influence as a result. You confirmed the work of Ascalane Partners Ltd, and specifically your commission with CCL, excludes any government contact, reducing the risk that you could be perceived to be lobbying government – which all former ministers are prevented from doing for two years after leaving office.

#### The Committee's advice

10. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These seek to prevent you from making use of privileged information, contacts and influence gained from your recent time in ministerial office to the unfair advantage of CCL, under Ascalane Partners Ltd.
11. The Committee advises, under the government's Business Appointment Rules, that this commission with **CCL Solutions Group Ltd** should be subject to the same conditions applied to your independent consultancy:

- 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 service;
- for two years from your last day in ministerial service, you should not become personally involved in lobbying government or any of its arm's length bodies on behalf of CCL Solutions Group Ltd (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage CCL Solutions Group Ltd (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial service, you should not provide advice to CCL Solutions Group Ltd (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 and its arm's length bodies;
- for two years from your last day in ministerial service, you should not become personally involved in lobbying contacts in other governments and organisations that you developed during your time in office for the purpose of securing business and/or investment opportunities for CCL Solutions Group Ltd; and
- for two years from your last day in ministerial office, before accepting any commissions for your independent consultancy and or/before extending or otherwise changing the nature of your commissions, you should seek advice from the Committee – the Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.

12. 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>2</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>2</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.

13. 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.
14. 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.*"
15. You must inform us as soon as you take up this role, or if it is announced that you will do so. You must 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.
16. 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  
ACOPA**

## **Annex – material information**

### The work

1. You stated this is a commission under your independent consultancy, Ascalane Partners Ltd, which provides provides strategic counsel to clients on:
  - corporate strategy
  - strategic analysis, including on the broad political landscape and public policy
  - operational practices and ways of working
  - campaigns
  - messaging
  - media presentation, including crisis communications
  - general coaching around parliamentary appearances, such as Select Committees
  - analysis, support and advice to clients on UK public policy and regulatory developments and the broader political landscape which may affect their interests, where relevant.
2. You stated Ascalane Partners would never disclose privileged information from your time in government and would not:
  - lobby government ministers or officials, nor have any engagement with government on behalf of clients
  - seek to draw on your network of contacts in government
  - have involvement with bids or contracts involving government.
3. According to its website, CCL is one of Europe's leading digital forensics, digital investigation, and cyber security specialists. It supports law enforcement, governments and public and private sector organisations in the recovery, examination, assessment, and protection of data. It also states it works regularly with the National Crime Agency, the Metropolitan Police, UK regional forces, His Majesty's Revenue and Customs as well as governments.
4. You stated your role as Consultant involves the provision of Ascalane's consultancy services relating to CCL, in line with the description provided of Ascalane's consultancy work, specifically:

*'Analysis, support and advice to clients on UK public policy and regulatory developments and the broader political landscape which may affect their interests, where relevant.'*

### Dealings in office

5. Of your time in your recent DWP and Home Office roles, you stated that:

- you did not meet with CCL, nor were you involved in any policy, commercial or regulatory decisions specific to the company
- regarding your access to information, you stated that you possess no sensitive information that could offer an unfair advantage to CCL.

#### Departmental assessment

6. The Home Office and DWP confirmed the details you provided, stating they:
  - had no concerns regarding decisions or policies made during your time in office that could provide an unfair advantage to CCL
  - consider you not to possess sensitive information that could provide an unfair advantage to CCL.
7. The departments recommended that the standard conditions apply to your proposed appointment.