



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Sir Grant Shapps, former Secretary of State for Defence. Paid Appointment with 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 a paid appointment with Ascalane Partners Ltd (Ascalane Partners) as an Advisor.
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 Ascalane Partners as a former minister. The material information taken into consideration by the Committee is set out in the annex below.
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. Ascalane Partners is an advisory firm providing strategic counsel to clients on campaigning, media communications, UK public policy, regulatory developments and, where relevant, the broader political landscape which may affect their needs, as well as operational practices. As an Advisor, your role would be to act as an independent, ad hoc advisor, providing strategic input to support the company's development and direction. You said that you will have limited operational or client-facing responsibilities.

6. Ascalane Partners was founded in January 2025, after you had left office. Therefore, you did not meet with, nor make any policy, regulatory or commercial decisions specific to, Ascalane Partners. Therefore, the Committee¹ considered the risk that this role could reasonably be seen as a reward for decisions made in office was low.
7. As the former Secretary of State for Defence and previously Secretary of State for Energy Security and Net Zero, you would have had access to a wide range of sensitive information. There is a broad overlap here, given Ascalane Partners has clients within a variety of sectors, including defence and technology, foreign affairs, and geopolitics. There are several factors that limit the risks here:
 - the risk is broad rather than specific to this company or its clients;
 - the Ministry of Defence (MOD) considered this risk to be limited, given the passage of time and significant movements in the defence landscape since you left office in July 2024, such as the published 2025 Strategic Defence Review; and
 - the Department for Energy Security and Net Zero (DESNZ) considered the information that you had access to in post was now over two years ago and would no longer be sufficiently up to date to offer unfair insight.
8. There remains a risk in relation to your general access to information, as the former Secretary of State for Defence. It is difficult to demonstrate you have no relevant information that could offer an unfair insight to Ascalane Partners, given its clients are unknown. The risk regarding your access to information is greatest should you be asked to advise on matters directly related to your responsibilities at the MOD.
9. There are also risks associated with your influence and contacts gained whilst in office – both those internal to government, and those in other governments and industry, particularly within defence. The Committee therefore considered your network and influence could be seen to unfairly advantage Ascalane Partners or its clients. You confirmed that your work with Ascalane Partners excludes any lobbying of the UK government – which all former ministers are prevented from doing for two years under the government's Rules.

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 office to the unfair advantage of Ascalane Partners. Alongside the

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

standard conditions, to mitigate the risk associated with advising unknown clients and areas which may overlap with your time in ministerial office, the Committee has imposed an additional condition which prevents you from advising Ascalane Partners on the UK defence sector.

11. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **Ascalane Partners Ltd** 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 government or any of its arm's length bodies on behalf of Ascalane Partners 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 Ascalane Partners Ltd (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to Ascalane Partners Ltd (including parent companies, subsidiaries or partners) on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of the UK government, NATO allied militaries, the MOD and its trading funds, or their arm's length bodies;
- for two years since your last day in office, you should not work in, or advise Ascalane Partners Ltd (including parent companies, subsidiaries, partners, investees, and clients) on defence matters; and
- 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 Ascalane Partners Ltd (including parent companies, subsidiaries and partners).

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.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.

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 Ministerial 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 employment with this organisation, 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 role

1. Ascalane Partners is an advisory firm that provides the strategic counsel in the following areas:
 - Corporate strategy
 - Strategic analysis, including on the broad political landscape and public policy

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.

- Review operational practices and ways of working
 - Campaigns
 - Messaging
 - Media presentation, including crisis communications
 - General coaching around parliamentary appearances, such as select committees
2. It describes its specialist areas as:
- Defence and Technology
 - Aviation and Aerospace
 - Maritime: Shipping, Ports and Shipbuilding
 - Logistics, Infrastructure and Trade
 - Foreign Affairs and Geopolitics
 - Home Affairs and Justice
 - Work and Employment
 - Food and Farming
 - Heritage and Cultural Affairs
 - Land use, Planning and Development
3. Ascalane Partners was founded by two former ministers in January 2025 who received ACOBA's advice³ for the creation of this consultancy. The advice included a condition to return for advice under the Rules for each new commission/ client it takes up.
4. In your paid, part-time role as Advisor you said you will serve as an independent, ad hoc advisor, providing strategic input to support the development and direction of the business. You said that this will be an occasional, consultancy-based role. You said that you will have limited operational or client-facing responsibilities.
5. You confirmed you will:
- have no contact with government;
 - not be involved in any lobbying of the government; and
 - not draw on any privileged information from your time in office for the purposes of this role.

Dealings in office

6. As above, Ascalane Partners was founded after you had left office. To that end, you said you had no involvement in policy, contractual and/or commercial decisions specific to the company, nor did you have any official dealings/ contact with it. The MOD does not have a relationship with the company.

Departmental Assessment

³ [Advice Letter: Robert Courts, Director, Ascalane Partners](#) and [Advice Letter: Tom Pursglove, Director, Ascalane Partners](#)

7. Both the MOD and DESNZ were consulted on this appointment.

8. The MOD provided the following information:

- you did not make any decisions specific to Ascalane Partners as it had not been established during your time in office;
- you did not have any contact with Ascalane Partners or any competitors;
- you appeared before the Defence Committee chaired by Robert Courts (Director of Ascalane Partners) during your tenure as Secretary of State, but it did not consider this raised any risks under the Rules in relation to this appointment;
- in light of your seniority, you did have access to privileged information that could provide insight into the inner workings of the MOD that could confer an indirect advantage to Ascalane Partners, though it found no specific information or risk; and
- the change in government and significant movement in the defence landscape since you left office reduce the likelihood this information is sufficiently up to date to offer an unfair advantage (e.g. structural changes to the MOD through Defence Reform as seen in the 2025 Strategic Defence Review⁴).

9. DESNZ provided the following information:

- you did not make any decisions specific and/or relevant to Ascalane Partners;
- you did not have any contact with Ascalane Partners or any competitors; and
- you may have had access to privileged information regarding government policy that could provide insight to Ascalane Partners, but the risk is limited and would not amount to an unfair advantage – given the time elapsed since you left office and the subsequent changes in government.

10. DESNZ recommended the standard conditions.

⁴ [The Strategic Defence Review 2025 - Making Britain Safer: secure at home, strong abroad - GOV.UK](https://www.gov.uk/government/consultations/the-strategic-defence-review-2025)