



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

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

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BUSINESS APPOINTMENT APPLICATION: Ms Joanna Rowland, former Director General, Customer Services Group, Director General, UK Visas and Immigration, and Director General, His Majesty's Passport Office at the Home Office. Paid appointment with the Royal Society for the Prevention of Cruelty to Animals.

1. Ms Rowland 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 taking up a role as a Chief Executive Officer (CEO) with the Royal Society for the Prevention of Cruelty to Animals (RSPCA).
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 Rowland's time in government service, alongside the information and influence she may offer the RSPCA. 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 Rules set out that Crown servants must abide by the Committee's advice¹. 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.

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

The Committee's consideration of the risks presented

5. The RSPCA is the largest charity promoting animal welfare in England and Wales. It provides services which include investigating cruelty, rescuing and rehoming animals, caring for sick and injured animals, and educating the public and future generations about animal welfare. The RSPCA has a relationship with the government, advocating for animal welfare and aims to influence animal welfare policy by providing evidence and lobbying policymakers, including: local governments, the police, fire and rescue services, housing providers, and other authorities². The Home Office stated that the RSPCA lobbies the department's Animals in Science Unit regarding the use of animals in laboratories, primarily in the regulation space.
6. Ms Rowland made no policy, regulatory or commercial decisions specific to the RSPCA during her roles as Director General at the Home Office. Whilst the RSPCA has a collaborative relationship with the Home Office, this work is led by the Animals in Science Unit and the Home Office confirmed Ms Rowland had no involvement in or oversight of the RSPCA's dealings with the Home Office. The Committee³ therefore considered the risk this role could reasonably be perceived as a reward for decisions made in office was low.
7. As a senior Crown servant, Ms Rowland will have access to a range of sensitive information that could benefit any organisation, including the RSPCA. The risks are limited as there is no direct overlap with her responsibilities as Director General and the work of the RSPCA. Further, the Home Office does not consider Ms Rowland possesses any sensitive information that would likely provide the RSPCA an unfair advantage.
8. Ms Rowland's network of contacts in government may be seen to offer the RSPCA unfair access to government, particularly as it seeks to influence departments on animal welfare. It would be improper for Ms Rowland to seek to influence the government or its arm's length bodies given the lobbying ban that applies to all former senior Crown servants under the Rules for two years on leaving government service. To do so, risks providing an unfair advantage to one cause over another, in relation to the government's policy and/or options.
9. Whilst Ms Rowland will advocate for the RSPCA, she has confirmed that her role will not involve lobbying the government on policy, commercial and funding matters. This was confirmed in writing by the RSPCA which added that this work

² www.rspca.org.uk/whatwedo/endcruelty/changingthelaw#:~:text=Changing%20the%20law,and%20make%20their%20points%20heard

³ This application for advice was considered by Isabel Doherty; Sarah de Gay; Hedley Finn OBE; Dawid Konotey-Ahulu CBE DL; Michael Prescott; and The Baroness Thornton.

will be led by the RSPCA Director of Advocacy and Prevention. In the event that the government wishes to discuss such matters specifically with Ms Rowland, any such contact initiated by the government would be entirely in keeping with the lobbying ban.

10. As CEO, Ms Rowland's role involves developing, overseeing and monitoring a programme of income generation for the RSPCA. There is a potential risk that she could be seen to offer an unfair advantage to the RSPCA if she were to draw on private sector contacts she gained as a result of her recent time in government service. The Committee noted that given her duties in government service this risk is limited.

The Committee's advice

11. There is a broad overlap with some of the RSPCA's work and the Home Office in respect of animal welfare. The risks here are limited given Ms Rowland's responsibilities at the Home Office did not cover this area.
12. When considering the risks in this case, the Committee considered it significant that the RSPCA confirmed that as Ms Rowland will not be involved in lobbying the government in her role as CEO - in line with the expectations set out in the Rules.
13. The Committee advises, under the government's Business Appointment Rules, that Ms Rowland's role with **Royal Society for the Prevention of Cruelty to Animals** should 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 any of its arm's length bodies on behalf of Royal Society for the Prevention of Cruelty to Animals (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 Royal Society for the Prevention of Cruelty to Animals (including parent companies, subsidiaries, partners and clients);
 - for two years from her last day in Crown service, she should not provide advice to Royal Society for the Prevention of Cruelty to Animals (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 its arm's length bodies; and

- for two years from her last day in Crown service, she should not become personally involved in lobbying contacts in other governments and organisations that she developed during her time in Crown service, for the purpose of securing business for the Royal Society for the Prevention of Cruelty to Animals.

14. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's 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' Interests⁴. 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.
15. 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.
16. 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.'*
17. Ms Rowland must inform us as soon as she takes up this work or if it is announced that he will do so. Similarly, she must inform us if he proposes to extend or otherwise change his role with the organisation as depending on the circumstances, it might be necessary for her to seek fresh advice.
18. Once this 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.

Annex – Material information

The role

1. The RSPCA is the largest charity promoting animal welfare in England and Wales. The RSPCA operates through donations, providing services such as investigating cruelty, rescuing and rehoming animals, caring for sick and injured animals, and educating the public and future generations about animal welfare. According to its website, the RSPCA works to change laws, policies, and public attitudes to create a better world for all animals ⁵. The RSPCA has relationship with the government, advocating for animal welfare and aims to influence animal welfare policy by providing evidence, lobbying policymakers, national governments, local governments, the police and fire and rescue services, housing providers, and other authorities⁶.
2. Of her paid, full-time role as CEO, Ms Rowland described her duties as:
 - to provide leadership and direction to the RSPCA, and report to the RSPCA Board of Trustees, on governance, strategy, people, policy, fundraising, service delivery, risk and finances, including:
 - working closely with the RSPCA Board Chair to ensure that the RSPCA is well governed within the strategic and accountability frameworks laid down by the Board of Trustees to achieve the RSPCA's vision, mission, beliefs and culture
 - ensure that RSPCA Assured and RSPCA Trading have appropriate strategies to meet their purposes
 - building the society's reputation and influence in England, Wales and overseas
 - supporting the 140 largely volunteer-run RSPCA branches to deliver practical animal welfare via the RSPCA and branch-run network of approx. 60 animal centres and wildlife centres, three animal hospitals and 40 clinics.

⁵ www.rspca.org.uk/whatwedo/whoweare#:~:text=We're%20the%20Royal%20Society,Here's%20how%20we%20do%20it

⁶ www.rspca.org.uk/whatwedo/endcruelty/changingthelaw#:~:text=Changing%20the%20law,and%20make%20their%20points%20heard

- to be accountable to the Board of Trustees for:
 - developing and agreeing the strategic direction of the RSPCA
 - ensuring the society's financial health, including developing, overseeing and monitoring an effective programme of income generation including a balanced budget and required levels of reserves
 - developing the RSPCA and branch relationships
 - providing active leadership to ensure that the RSPCA's strategy is effectively implemented, reviewed and has impact
 - leading the society effectively and efficiently
 - oversight of RSPCA Assured strategy delivery and effective delivery of operational plans maximising impact and effective risk management.
3. Ms Rowland stated her role will not have any involvement with the departments she was directly employed by during her time in Crown service. She stated her role may have some indirect involvement with the Department for Environment, Food and Rural Affairs on animal welfare policy development and farming practice. She stated this involvement with government would be conducted by the RSPCA policy team rather than directly by herself.
 4. Ms Rowland stated she was headhunted by recruiters and then partook in a process of assessing mutual suitability.

Correspondence with RSPCA

5. The RSPCA confirmed in writing its understanding of, and agreement to, comply with the Committee's advice. It stated the organisation will support Ms Rowland in adhering to ACOBA's conditions and will not ask her to undertake any duties that would amount to a breach of them.
6. The RSCPA stated that any lobbying by the organisation would be undertaken through the Director of Advocacy and Prevention, not by Ms Rowland and thus sits separate to her duties as CEO.
7. The RSPCA stated it has a team that are responsible for advocating on behalf of animals to Members of Parliament, influencers and the general public. The remit of this work is to advocate rather than lobby and they will take the lead in this activity - not Ms Rowland. Ms Rowland's role will require her to front campaigns and have her name put to published papers, speak to the media, and represent the RSPCA at events, meetings and fundraisers. The RSPCA stated it is mindful of the requirements of the Business Appointment Rules and the RSPCA's Chair commits to providing Ms Rowland with the support to

ensure that her involvement in our campaigning activities is mindful of these restrictions. The organisation noted that there are times that government bodies reach out to the RSPCA for its commentary, and the charity would fully expect Ms Rowland to be involved in these meetings.

8. The RSCPA stated its strategy and operating activities do not currently involve the organisation bidding for or undertaking contracts for work with the UK government as this activity would sit outside of its current scope of service. The RSPCA stated that where the organisation has supported the UK government in the past - for example with the setting up of a canine reception facility during the early stages of the Ukraine conflict - this was in response to a direct request from Animal and Plant Health Agency rather than any direct activity on the RSPCA's behalf.

Dealings in office

9. Ms Rowland stated she did not meet with the RSPCA during her time in office, nor did she have involvement in policy, commercial or regulatory decisions specific to the organisation. She added that she did not possess sensitive information that may provide the RSPCA an unfair advantage.

Departmental assessment

10. The Home Office confirmed the details provided by Ms Rowland and stated:
 - there is no overlap with her duties as Director General and the work of the RSCPA, nor was she involved in the RSPCA's work with the department's Animals in Science Unit
 - she does not possess sensitive information that may provide the RSPCA an unfair advantage
 - she was not privy to discussions relating to Animals in Science that have taken place at the Home Office Executive Committee during her time as Director General.
11. The Home Office stated does not have any contractual/funding relationship with the RSPCA, though the charity is a stakeholder organisation with a generally collaborative relationship with the Home Office, as described below:
 - the RSPCA lobbies the Animals in Science Unit of the Home Office regarding the use of animals in laboratories. The Home Office stated this engagement is primarily in the regulation space and is managed at a working level.

- the RSPCA's work informs the Independent Animals in Science Committee. The RSPCA Chair may have previously been involved in regulatory reform but is not currently.
- in 2025, the Home Office co-chaired an Animal Welfare and Ethical Review Body UK (AWERB UK) sectoral meeting with the RSPCA, who run AWERB UK. This meeting contributes to Animals in Science Committee advice commissioned by the minister and informs the Animals in Science Regulatory Unit on its regulatory policy. All of this work is run out of the Animals in Science Unit.

12. The Home Office noted that while Ms Rowland's proposed role as CEO does not overlap with her time in government service, she must not share any privileged information and must not be involved in any lobbying.

13. The Home Office recommended the standard conditions.