



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Tom Pursglove, former Minister of State for Legal Migration and the Border at the Home Office. Paid appointment with Future Fuels Partnership.

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 a Partner with Future Fuels Partnership (FFP).
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 Future Fuels Partnership. 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. You described FFP as a clean fuel consultancy company which deals with supplier companies. You stated that, as a Partner, you would be responsible for overseeing operations relating to sustainable fuel distribution – either with FFP as an intermediary, or a distributor itself – to industries with high fuel consumption who wish to see better environmental and cost outcomes.
6. The Home Office and Department for Work and Pensions (DWP) confirmed that you did not make any commercial, regulatory, or policy decisions specific to FFP or the sector it operates in, nor did you meet with the company during your time in office. Therefore, the Committee¹ considered the risk that you were offered this role as a reward for decisions or actions taken in post was low.
7. There is no direct overlap with your responsibilities in office and this proposed work. You would have had access to a range of sensitive information, though both your former departments confirmed there is no specific information you have access to that would likely grant FFP an unfair advantage. Further, you have been out of office for 15 months, creating a gap between when you last had access to sensitive information and taking up this role.
8. As FFP's clients are unknown, as are the specific pieces of work you will undertake, there are risks that you may be asked to advise on matters for which you had specific responsibility whilst in office. Whilst this raises unknown risks, the Committee recognised these are limited given this work is unlikely to overlap with your ministerial portfolio.
9. As with any former minister, there are risks associated with your contacts and influence within government and the potential for FFP to gain unfair access or influence as a result. You confirmed your role as a Partner will exclude any dealings with government.
10. As a Partner, your role is likely to involve business development. There is a risk you may be seen to be able to draw on contacts you may have gained in ministerial office but in external organisations and foreign governments to gain business or investment for FFP.

The Committee's advice

11. The Committee determined that the risks identified in this application 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 FFP. As in all

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

applications to work with unknown clients, this includes a restriction to prevent you from advising on work specifically overlapping with your recent ministerial role.

12. 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 FFP.

13. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Future Fuels Partnership** 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 Future Fuels Partnership (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 Future Fuels Partnership (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office you should not undertake any work with Future Fuels Partnership (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 from your last day in ministerial office, you should not advise Future Fuels Partnership (including parent companies, subsidiaries, partners and clients) on any policy you had specific involvement in or responsibility for as Minister of State for Legal Migration and the Border, or 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 organisations for the purpose of securing business for Future Fuels Partnership (including parent companies, subsidiaries and partners).

14. 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.
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 or otherwise.
16. 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.'*
17. 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.
18. Once the appointment has been publicly announced or taken up, this advice will be published

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 that FFP is a partnership also involving Rt Hon Nigel Adams, former Minister of State without Portfolio at the Cabinet Office and Robert Courts KC, the former Solicitor General and Aviation and Maritime Minister. Its focus is on clean and future fuels with supplier companies.
2. You stated that, in your paid, part-time role as a Partner, you will be responsible for overseeing operations relating to sustainable fuel distribution – either with FFP as an intermediary, or a distributor itself – to industries with high fuel consumption who wish to see better environmental and cost outcomes.
3. You stated that your role will not involve contact with government.

Dealings in office

4. You stated you did not have involvement in any policy, commercial or regulatory decisions specific to FFP, nor did you meet with the company during your time in office. You added that you do not possess sensitive information that could provide an unfair advantage to FFP.

Departmental assessment

5. The Home Office and DWP confirmed the details above, and recommended the standard conditions to be applied to this appointment.