



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon The Lord Cameron of Chipping Norton, former Secretary of State for Foreign, Commonwealth and Development Affairs. Paid appointment with DLA Piper LLP (US).

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 an appointment as a Strategic Advisor with DLA Piper LLP (US) (DLA Piper).
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 made during your time in office, alongside the information and influence you may offer DLA Piper. 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. DLA Piper is a global law firm operating through various separate and distinct legal entities. DLA Piper has contracted with the UK government providing legal advisory services. This has included advising the Foreign, Commonwealth & Development Office (FCDO) on the subject matter of the

UK government's participation in The Innovative Finance Facility for Climate in Asia and the Pacific (IF-CAP) ^{1 2}. You also told the Committee DLA Piper has represented the FCDO with respect to the ongoing COVID-19 Inquiry.

6. The FCDO confirmed that you did not meet with, nor were you involved in any policy, regulatory or commercial decisions specific to DLA Piper. Whilst you were Foreign Secretary with overall responsibility for the department, the FCDO confirmed you were not sighted or involved in DLA Piper's work on IF-CAP, nor the COVID-19 Inquiry. Therefore, the Committee³ considered that the risk that this role could be seen as a reward for decisions made in office is low.
7. As the former Foreign Secretary, there are risks associated with your access to privileged information. The FCDO was not aware of any specific information you have had access to that would offer any particular unfair advantage to DLA Piper. This is a broad risk and given DLA Piper's clients are unknown, it is most likely to arise should you look to advise on matters that directly overlap with your time as Foreign Secretary.
8. There are risks associated with your influence and network of contacts gained whilst in ministerial office both within government and externally – that you could offer DLA Piper and its clients unfair access to government, or make use of external contacts gained to obtain new business.

The Committee's advice

9. To address the risk associated with DLA Piper's unknown clients, the Committee has imposed a condition that prevents you from advising on any matters that you had a material role in developing or determining, or where you had a relationship with the relevant client in your role as Foreign Secretary.
10. The remaining risks can be appropriately mitigated by the conditions below which seek to prevent you from making improper use of privileged information, contacts and influence to the unfair advantage of DLA Piper.

¹ www.dlapiper.com/en/news/2024/11/dla-piper-advises-foreign-commonwealth-development-office-on-multidonor-sustainable-finance-fund

² IF-CAP is a multi-donor financing partnership facility with the goal of scaling-up finance for accelerated action against climate change in Asia and the Pacific – of which the Foreign Secretary announced in November 2024 a guarantee of \$280 million (around £220 million) to the new IFCAP initiative, which the UK is a founding partner of together with the Asian Development Bank and the other financing partners.

³ This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Sarah de Gay; Dawid Konotey-Ahulu CBE DL; Hedley Finn OBE; Michael Prescott; and Mike Weir.

11. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **DLA Piper LLP (US)** 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 any of its arm's length bodies on behalf of DLA Piper LLP (US) (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 contacts to influence policy, secure business/funding or otherwise unfairly advantage DLA Piper LLP (US) (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to or on behalf of DLA Piper LLP (US) (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 any of its arm's length bodies;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you developed during your time as Foreign Secretary in other governments and organisations for the purpose of securing business for DLA Piper LLP (US); and
- for two years since your last day in office, you should not advise DLA Piper LLP (US) or its clients on any work with regard to any policy decisions which you had a material role in developing or determining, or where you had a relationship with the relevant client during your time as Foreign Secretary.

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.⁴ You are reminded that as a Member of the House of Lords you are prevented from any paid lobbying under the House of Lords Code of Conduct. It is an applicant's personal responsibility to understand any

⁴ All Peers and Members of Parliament are prevented from paid lobbying under the the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your 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.

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 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 employment with this organisation, or if it is announced that you will do so. Please 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 Doverty
Interim Chair

Annex – Material information

The role

1. DLA Piper is one of the largest law firms in the United States and the Americas. It has provided legal advisory services to the FCDO and the government widely. During your time in government service, DLA Piper advised the FCDO on its participation in The Innovative Finance Facility for Climate in Asia and the Pacific (IF-CAP). IF-CAP is a multi-donor financing partnership facility with the goal of scaling-up finance for accelerated action against climate change in Asia and the Pacific – in which the current Foreign Secretary announced in November 2024 a guarantee of \$280 million (around £220 million) to the new

IF-CAP initiative, which the UK is a founding partner of together with the Asian Development Bank and the other financing partners⁵.

2. You wish to take up a paid, part-time role as Strategic Advisor, where you will:
 - provide strategic and geopolitical advice to the firm's leadership team with a particular emphasis on global risk.
 - assist in convening and attending meetings to strengthen relationships with key firm partners and clients, and attending/ participating at events for the firm.
3. You confirmed your role will not involve contact with the UK government and stated that there are clear guardrails put in place in the role to ensure this.

Dealings in office

4. You stated that DLA Piper has a relationship with the FCDO – as DLA Piper International has represented your former department with respect to the current UK COVID-19 Inquiry.
5. You said that you did not meet with, nor make any policy, commercial or regulatory decisions specific to, DLA Piper in your capacity as Foreign Secretary.

Departmental assessment

6. The FCDO confirmed the details you provided, stating that you were not involved in decisions specific to DLA Piper, did not engage with the company during your time as Foreign Secretary, nor possess sensitive information of relevance.
7. The FCDO stated it has a historic relationship with DLA Piper. The FCDO Legal Directorate stated that:
 - DLA Piper was previously contracted by the Operations Committee in September 2022, which was prior to your time in office and the contract was handled by the Director General Legal at the time as well as the contract extension.
 - DLA Piper was contracted by FCDO to provide advice on Development Capital grants during your time as Foreign Secretary, but you did not

⁵ www.gov.uk/government/news/uk-confirms-help-for-developing-countries-to-tackle-climate-change-and-build-greener-future#:~:text=The%20Foreign%20Secretary%20also%20announced%20a%20guarantee,to%20the%20UK.%20The%20Foreign%20Secretary%20said:

have any involvement in decisions nor awareness of matters involving DLA Piper and FCDO.

- the COVID-19 Inquiry team responded separately in respect of DLA Piper's engagement on the subject matter – without your involvement.

8. The FCDO did not have concerns with the appointment and recommended the standard conditions together with a limitation on the role to prevent you from undertaking any work that overlaps with your time as Foreign Secretary. It also noted that the FCDO Permanent Under-Secretary considered that there was a low risk of unknown clients presenting a risk.