



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Baroness Sugg CBE, former Special Adviser to the Foreign Secretary at the Foreign, Commonwealth and Development Office. Paid appointment with Ridne.

1. The Baroness Sugg 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 an appointment with Ridne as an Advisory Board Member.
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 Baroness Sugg's time in government service, alongside the information and influence she may offer Ridne as a former special adviser. 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 Rules¹ set out that Crown servants must abide by the Committee's advice. 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.

The Committee's consideration of the risk presented

5. Ridne is a consortium of 11 food processing firms and 20 farms, providing food aid and social assistance in Ukraine, employing over 2000 staff, and distributing over 300,000 food packages monthly. It was founded at the start of the Russian

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.

invasion in Ukraine in 2022. It aims to unite farmers and food producers to meet Ukraine's food aid needs through domestic production.

6. Whilst Ridne has an interest in foreign policy matters, the Foreign, Commonwealth and Development Office (FCDO) confirmed it does not hold a relationship with the company, commercial or otherwise. Further, Baroness Sugg did not make any policy, regulatory or commercial decisions specific to Ridne, nor did she meet with the organisation whilst in post. Therefore, the Committee² did not consider this role could reasonably be perceived as a reward for decisions made or actions taken in office.
7. As the Special Adviser to the Foreign Secretary, Baroness Sugg would have had access to a range of sensitive information which could provide benefit to a range of organisations. Whilst she may have been broadly involved in aid to Ukraine, in line with wider government policy, the risks here are limited as there is no direct overlap with her responsibilities in government and Ridne. The FCDO does not consider Baroness Sugg to possess sensitive information that is likely to provide Ridne an unfair advantage. Further, it has been over 12 months since she left government service – reducing the currency of any information she may possess.
8. There are risks associated with Baroness Sugg's contacts and influence within the UK government. Baroness Sugg confirmed her role as Advisory Board Member excludes any dealings with government, reducing the risk she could be perceived to be lobbying government – which all former senior Crown servants are prevented from doing for two years after leaving government service.

The Committee's advice

9. The Committee determined the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear Baroness Sugg cannot make use of information or influence gained from her time in Crown service to the unfair advantage of Ridne.
10. The Committee advises, under the government's Business Appointment Rules, that Baroness Sugg's appointment with **Ridne** 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;

² This application for advice was considered by Isabel Doverty; Hedley Finn OBE; Sarah de Gay; Dawid Konotey-Ahulu CB DL; Michael Prescott; and The Baroness Thornton.

- for two years from her last day in Crown service, she should not become personally involved in lobbying government or any of its arm's length bodies on behalf of Ridne (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Ridne (including parent companies, subsidiaries, partners and clients); and
 - for two years from her last day in Crown service, she should not provide advice to Ridne (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 or its arm's length bodies.
11. The advice and the conditions under the government's Business Appointment Rules relate to Baroness Sugg'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' Interests³. Baroness Sugg is reminded that, as a Member of the House of Lords, she is prevented from any paid lobbying under the House of Lords Code of Conduct. 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.
12. 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.
13. 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.*'
14. Baroness Sugg must inform us as soon as she takes up this work or if it is announced that she will do so. Similarly, she must inform us if she proposes

³ 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 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.

to extend or otherwise change her role with the organisation as, depending on the circumstances, it might be necessary for her to seek fresh advice.

15. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Yours sincerely,

Hamzah Rizvi

Committee Secretariat

Annex – Material Information

The role

1. Ridne is a consortium uniting 11 food-processing firms and 20 farms, providing food aid and social assistance in Ukraine, employing over 2000 staff, and distributing over 300,000 food packages monthly. It was founded at the start of the 2022 Russian invasion of Ukraine, to unite farmers and food producers in order to meet Ukraine's food aid needs through domestic production. Since 2022, it has grown from a small-scale producer of foodstuffs into the largest producer and distributor of food aid in Ukraine.
2. According to its website, Ridne has a unique model using commercial production and sustainable practices to provide appropriate and high quality food aid. As traditional NGO and international agency models struggle due to reduced international funding, its commercial structure means it is growing and helping more and more vulnerable families with food aid, access to social centres and now with seeds, allowing people to supplement their diet with home-grown produce.
3. In her paid, part-time role Advisory Board Member, Baroness Sugg stated she will help guide Ridne's commercial, humanitarian, and social impact projects and aim to alleviate hardship and rebuild Ukraine's agricultural economy.
4. Baroness Sugg confirmed her role will not involve contact with the UK government.

Dealings in office

5. Baroness Sugg stated as Special Adviser to the Foreign Secretary, she travelled to Ukraine but had no dealings with Ridne or any company of a similar nature.

6. Baroness Sugg stated she did not have involvement in any policy, commercial or regulatory decisions specific to Ridne, nor did she have access to sensitive information that may provide the consortium an unfair advantage.

Departmental assessment

7. The FCDO confirmed the details provided by Baroness Sugg.
8. The FCDO confirmed Baroness Sugg did not meet with Ridne, nor was she involved in decisions specific to Ridne during her time as Special Adviser to the Foreign Secretary.
9. The FCDO did not consider Baroness Sugg to possess sensitive information that may provide Ridne an unfair advantage.
10. The FCDO did not have concerns with the appointment, provided it is subject to the standard conditions.