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*Brexit, Cabinet Norms and the Ministerial Code: are we living in a post- Nolan era?*

Leighton Andrews

*Abstract*

The Nolan Report will celebrate its 25<sup>th</sup> anniversary in 2020 and for most of this last quarter-century has provided the underlying ethical basis for public life in the United Kingdom. However, its principles are now being called into question in a number of areas, following the Conservative government's loss of its Parliamentary majority in the 2017 election, with the interests of party taking precedence over adherence to both the spirit and the codified practical implementation of some of the ultimate outcomes of Nolan, namely the Ministerial Code and the Commissioner for Parliamentary Standards. This article argues, with explicit evidence and examples, that ministerial conduct that would not have been tolerated before 2017 is now being routinely ignored in the interest of maintaining party unity in order to deliver some form of Brexit. The article concludes by asking whether Nolan norms still command consensus post-Brexit.

Key words: Nolan; Ethics; Brexit; Norms; Ministerial Code

## *Brexit, Cabinet Norms and the Ministerial Code: are we living in a post- Nolan era?*

### *Introduction*

It's doubtful how many now remember John Major's hope that the Nolan Committee would be an 'ethical workshop'. The Committee on Standards in Public Life (CPSL) has become an integral institution within the Westminster machinery<sup>1</sup>. Its remit was expanded in 1997 by Tony Blair to look at party funding; it has taken on work in emerging areas of public concern, such as intimidation in public life and the use of artificial intelligence in the public sector. The Nolan principles have been widely adopted, including by the devolved administrations whose work is now technically outside the CPSL's remit. The CPSL's recommendations in respect of the working document, *Questions of Procedure for Ministers*, published only in 1992 by John Major himself, led to its formalisation into the Ministerial Code - as it was re-named by Tony Blair in 1997 - in addition to a Civil Service Code. Its recommendations in respect of Parliament, including the Parliamentary Commissioner for Standards, were debated and disputed by a wide range of former senior Conservative Parliamentarians including Enoch Powell and Edward Heath, before finally being adopted. Rules governing senior civil servants taking up business appointments were extended to ministers.

The Ministerial Code is now a core document underpinning the U.K.'s unwritten constitution. Ministerial Codes for the devolved administrations draw on, and are largely based on, the U.K. Ministerial Code. Since 2011, the Ministerial Code has been supplemented at a U.K. level by The Cabinet Manual. Since the 2017 election, however, breaches of the Code, and of other norms codified by Nolan and his successors in the CPSL, have regularly occurred. Prior to the Brexit vote in 2016, these transgressions would have been accompanied by a public and media outcry which would have shortened the ministerial lives of those involved: post-2016 they have, in some cases, been tolerated.

Explicitly, these issues relate to

- Misleading Parliament
- Business Appointments
- Collective responsibility
- Ministerial accountability

- Neutrality of the sovereign
- Impartiality of the civil service
- M.P.'s interests

These are, of course, unstable and unprecedented political times in the U.K. The U.K. is divided and polarised over Brexit. 2018 saw a record number of ministerial resignations in a single year. The Government has been found in contempt of Parliament. It has suffered unprecedented defeats. It has allowed Opposition motions to go through with no Government votes against to disguise the scale of defeat. It has been accused of abusing voting procedures in the Commons and pairing arrangements. It has suffered defections. Its performance in the recent European Parliament elections was its worst since 1832.

### *Misleading Parliament*

The Ministerial Code is explicit about the duty of Ministers to give 'accurate and truthful information to Parliament'. It says that Ministers who 'knowingly mislead Parliament' will be expected to offer their resignations to the Prime Minister. In the summer of 2018, Esther McVey, then the Secretary of State for Work and Pensions, made a number of statements to Parliament in respect of the National Audit Office's opinions of her department's progress on implementing Universal Credit which were incorrect. In an unprecedented move, the Comptroller and Auditor-General wrote to her to correct three statements<sup>2</sup>. Following receipt of the letter, Ms McVey went before the House of Commons to apologise for 'inadvertently misleading' the House. The Ministerial Code states that Ministers who discover 'any inadvertent error' must correct it 'at the earliest opportunity'. Ms McVey's apology was given swiftly following the receipt of the letter, enabling the Prime Minister to operate the letter of the Ministerial Code and keep Ms McVey in post, even if many felt that the tone of her apology, and her original statements, were a clear breach of spirit of the Code.

McVey's failure to resign then was a stark contrast to the example of the former Home Secretary, Amber Rudd, whose resignation letter stated that she was resigning because she

had ‘inadvertently misled’ the Commons Home Affairs Committee over targets for removing illegal immigrants. After Rudd’s resignation, an inquiry by former Ministry of Justice Permanent Secretary Sir Alex Allan was, in civil service terms at least, scathing about the civil service support given to the Home Secretary<sup>3</sup>.

Why one act of inadvertent misleading should be punishable by resignation while another is not is unclear and certainly inconsistent. In Rudd’s case, it may be that the story had been running for too long and she had in effect ‘doubled down’ on her misleading statement. Whether the Amber Rudd experience determined the Prime Minister to be more forgiving in the case of Esther McVey is unclear. It is hard to escape the conclusion that in July 2018, on the eve of the Chequers Cabinet on the Withdrawal Agreement, Brexit pressures were more acute. (Rudd eventually returned to government as Secretary of State for Work and Pensions in succession to McVey, seven months after the latter’s resignation over Brexit).

### *Business Appointments*

Nolan recommended that, like senior civil servants, ministers who leave office should seek permission from the Advisory Committee on Business Appointments (ACOPA) before accepting and taking up a business role. In July 2018, within a week of resigning as Foreign Secretary, Boris Johnson signed a contract with the Daily Telegraph to write a weekly column. He did not apply to ACOPA for permission until two weeks after signing the contract.

The Chair of ACOPA, Baroness Browning, wrote to Johnson on 8 August, saying:

The committee considers it unacceptable that you signed a contract with the Telegraph and your appointment was announced before you had sought and obtained advice from the Committee, as was incumbent upon you on leaving office under the Government’s Business Appointment Rules.

The letter pointed out that the rules were contained within the Ministerial Code and this was ‘a failure to comply with your duty’ to seek advice<sup>4</sup>. Johnson had been reminded in a

letter from his Permanent Secretary on leaving office of his duties. He claimed that he did not receive this letter before signing the contract.

The Committee refused to grant retrospective advice, stating that Johnson's actions were 'a breach of the rules'. It said that it expected that his Telegraph contract would be amended to confirm that he would not make use of privileged information arising from his role as Foreign Secretary.

In many eyes, Johnson's abuse of the rules was accentuated by his refusal to leave the Foreign Secretary's Carlton House residence for three weeks, despite warnings from the Permanent Secretary.

### *Collective Responsibility*

Collective responsibility as such was not a subject which the original Nolan report addressed in detail, but the principle of collective responsibility is set out in the Ministerial Code. The Code explains that the principle is intended to allow Ministers to express their views freely in private but maintain 'a united front' once decisions are reached. This also requires that the opinions expressed by Ministers in Cabinet, in Ministerial Committees, and in inter-ministerial correspondence, should remain private. The Cabinet Manual reinforces this requirement to abide by decisions that have been reached and explains that it may on occasion be 'explicitly set aside' with Ministers granted an 'agreement to differ'.

Following the Chequers Cabinet discussion on Brexit in July 2018, the Prime Minister wrote to Conservative M.P.s stating that collective responsibility, which had been suspended during the referendum in 2016, was now being 'fully' restored. Her argument was that she had 'allowed cabinet colleagues to express their individual views' while the policy was being developed. That 'fully' has never been satisfactorily explained. The assumption had been that collective responsibility had only been 'explicitly set aside' for the period of the referendum in 2016 in the Minute from the then Prime Minister David Cameron issued in January 2016. Indeed, 'special arrangements' were put in place in late 2016 to allow Ministers who had obtained approval from the Prime Minister to set out their personal

opinions on plans for a third runway at Heathrow<sup>5</sup>. I can find no statement from Theresa May between her becoming Prime Minister in July 2016 and the Chequers Cabinet in July 2018 that she had not fully restored collective responsibility. This appears to be a post hoc justification of two years of Cabinet dissent.

While Cabinet disagreements had surfaced throughout the previous three years, with differing shades of aggression and detail, in the run up to the initial March 29 deadline for leaving the European Union, they broke out into the open again. Liam Fox criticised Amber Rudd, David Gauke and Greg Clark for being public about their intention to stop No-Deal. In March 2019 there appeared to be a complete breakdown of Cabinet discipline over a series of Brexit votes, with remain-voting Cabinet Ministers voted against the government line, abstaining on a motion ruling out No-Deal Brexit. Six pro-Brexit Cabinet Ministers voted for the so-called Malthouse compromise on the Irish back-stop. The Prime Minister's PPS was alleged to be authorising the Remain Cabinet Ministers to vote against the government line – there was said to be 'fury' in the Government Whips' Office'<sup>6</sup>. Meanwhile, though public exposure of Cabinet disagreements on spending restrictions is not new, the recent regularity might be, as a precursor to the 2019 Conservative leadership election, when candidates on all sides were to take issue with the still-incumbent Prime Minister and Chancellor over austerity.

The principle that Cabinet discussions should happen in private has been breached on a regular basis. Boris Johnson, exceptionally, briefed his views on what the Brexit deal should be in an article in the *Daily Telegraph* in advance of a Cabinet meeting in September 2017, but there have been regular leaks from Cabinet, often detailed and precise as to the views of participants. In June 2018, the Prime Minister 'berated' Chief Secretary Liz Truss over her public criticisms of Michael Gove. Andrea Leadsom's comments at the Chequers Cabinet meeting were leaked to *The Times*. Just before her resignation from the Cabinet, Esther McVey was said to be 'in meltdown' at the critical five-hour Cabinet meeting on the Brexit deal, was shouted down by the Chief Whip, and had the Cabinet Manual statement on collective responsibility read to her by the Cabinet Secretary, while nine Cabinet members were said to have raised concerns. The Prime Minister warned Cabinet members that too many leaks from Cabinet meetings were happening and they occurred too often – her statement was immediately leaked. A further report said that the Chief Whip had stormed

out and the Prime Minister had gone ‘batshit’ at Cabinet Members for disloyalty. Cabinet Minutes were said to be reflecting concerns over the impact of the Brexit impasse on the Conservative party, as much as the government, in one leak in March 2019 – a leak which raises Ministerial Code questions in itself. A letter from Cabinet Secretary Sir Mark Sedwill warning of the dangers of a no-deal Brexit was leaked to the *Daily Mail* in April 2019. The Prime Minister rebuked Cabinet Ministers over breaches of collective responsibility at Cabinet in May 2019. A week later, on the eve of the European elections, a ‘mutinous meeting’ of the Cabinet forced the Prime Minister to drop compromise options with opposition led by Chris Grayling, Andrea Leadsom and Geoffrey Cox. A confidential Cabinet note warning that Britain would not be ready for a no-Deal Brexit in October was leaked to the *Financial Times* in June 2019<sup>7</sup>. It is, of course, impossible to rule out that leaks may have come from Number Ten in some cases.

### *Ministerial accountability*

The *Ministerial Code* institutionalises the concept of ministerial accountability when it says that ‘The Minister in charge of a department is solely accountable to Parliament for the exercise of the powers on which the administration of that department depends’, and reminds ministers that they must comply with what Parliament has set down on ministerial responsibility and accountability. These issues are reinforced in the *Cabinet Manual*. In 2017, three ministers – Michael Fallon, Damian Green and Priti Patel, resigned over ministerial code breaches of one form or another: in Green’s case after a formal investigation: in the other two cases, the resignations took place after additional information came to the attention of Number 10.

However, other apparent breaches of the Ministerial Code, including the duty to avoid confusing Ministerial and political work, and to avoid using government facilities for party political purposes, or transparency over meetings with lobbying groups appear to have been ignored. So Steve Baker allegedly held undisclosed meetings with the ERG, and attended ERG meetings in the House of Commons while a Minister, while Boris Johnson hosted the launch of a ‘think-tank’, the institute for Free Trade, at the Foreign and Commonwealth Office<sup>8</sup>



Amber Rudd's resignation over inaccurate answers to the Home Affairs Committee was a clear example of the principle of Ministerial Accountability in operation: Ministers are responsible for what happens in their departments, including mistakes by officials. But was she bound to go? In recent decades, Cabinet Secretaries have sought to make the definition of ministerial accountability more precise. Lord Hunt said in the 1980s 'The concept that because somebody whom the Minister has never heard of, has made a mistake, means that the Minister should resign, is out of date, and rightly so<sup>9</sup>.' During the Scott Inquiry, Sir Robin Butler argued controversially that Ministerial 'accountability' is 'a constitutional burden that rests on the shoulders of Ministers and cannot be set aside'. He said that it did not necessarily 'require blame to be accepted'. Instead, 'a Minister should not be held to blame or required to accept personal criticism unless he (sic) has some personal responsibility for or some personal involvement in what has occurred'<sup>10</sup>. In practice, as David Butler argued, there had been few resignations where Ministers had taken the blame for actions by their officials, and rather more where Ministers had refused to resign 'when their department has goofed'. A huge amount is left to Prime Ministerial discretion<sup>11</sup>.

Chris Grayling provides a test case for this. The Institute for Government is a think-tank which is well-respected on all sides of politics throughout the U.K. It is not known for bluster or hyperbole. In March 2019 its senior researcher, Tom Sasse, wrote 'The continued survival of Chris Grayling in government sets a dangerous precedent for the principle of ministerial accountability'. Grayling, said Sasse, had 'presided over a series of botched projects and expensive failures during his eight years in office'. As he pointed out, the Twitter hashtag #failinggrayling was often seen. Grayling's ministerial record, he said, was 'abysmal'. But as the manager of Theresa May's leadership campaign, he was untouchable. In the week of Sasse's article *The Times* had written of Grayling in an editorial that 'his ministerial incompetence has gone on for too long'. An article detailed his 'many mishaps'. The Guardian said 'Failing Grayling is not funny anymore'. It stated 'it is Mr Grayling's incompetence that makes him unfit for the high public office he now holds'. It is hard to avoid Sasse's conclusion that Grayling remained because he was 'a high profile Brexit-backing minister in a divided Cabinet'<sup>12</sup>.

This is not to say that Theresa May was not prepared to sack people where the case is overwhelming. Her letter to Gavin Williamson stating ‘your conduct has not been of the same standard as others’; there was ‘compelling evidence’ that he was behind the leak, that ‘no other, credible version of events’ could explain it, and that she could no longer ‘have full confidence’ in him is, in the history of ministerial sackings, pretty brutal and emphatic<sup>13</sup>. But the Williamson case has proved an exception over the last two years.

### *Neutrality of the sovereign*

Chapter One of *The Cabinet Manual* is called ‘The Sovereign’. It is an upfront statement that the U.K. is technically a constitutional monarchy. The Manual states in its Introduction: ‘The UK is a Parliamentary democracy which has a constitutional sovereign as Head of State’. It is widely understood that one of the reasons for drafting the Manual in the first place was that the closeness of the opinion polls in 2009 suggested that a hung parliament was possible, and in that case ‘the constitutional procedures to be followed’ should be ‘made clear and open’<sup>14</sup>. It is likely, though unstated, that there was a desire to clarify those procedures in order to ensure that, whatever choices she might be called upon to make in the context of a hung parliament, the Sovereign should not be drawn into party politics: as former Cabinet Secretary Gus O’Donnell said later ‘it is important that the Queen stays above politics’<sup>15</sup>. Changes were made to the Manual on whether there was a duty on the incumbent Prime Minister to stay in office until it was clear that a successor was obvious<sup>16</sup>. The current edition of the Cabinet Manual, in the chapter on ‘Elections and Government Formation’, clearly states

In modern times the convention has been that the Sovereign should not be drawn into party politics, and if there is doubt it is the responsibility of those involved in the political process, and in particular the parties represented in Parliament, to seek to determine and communicate clearly to the Sovereign who is best placed to be able to command the confidence of the House of Commons.

Early in 2019, a comment by the Queen that politicians should ‘seek common ground’ – assumed to be a reference to Brexit - ‘while never losing sight of the bigger picture’ drew criticism from *The Times*:

The success of the royal family has been based on the fact that the Queen has remained above the political fray. She would do well to stay there.

The *Guardian* however saw the Queen’s comments as an illustration of the depth of the crisis to which the U.K. was headed as prominent Brexiteers suggested prorogation of Parliament, first aired by members of the European Research Group such as Jason Rees-Mogg<sup>17</sup>.

The Cabinet Manual makes clear the role of the Sovereign in the Prorogation of Parliament:

Parliament may be prorogued before being dissolved or may just adjourn. It has not been modern practice for Parliament to be dissolved while sitting. Prorogation brings a Parliamentary session to an end. It is the Sovereign who prorogues Parliament on the advice of his or her ministers.

These issues obviously have an added salience today. The idea that Parliament might be prorogued to enable a no deal Brexit was advocated by Conservative leadership candidates. Since the Sovereign had to prorogue Parliament it would inevitably bring the Queen into a controversy that has divided the people of the U.K., threatens the Union and affects relationships with neighbouring states. The Cabinet Secretary publicly warned Conservative leadership candidates about this in a lecture at the Institute for Government in June.<sup>18</sup>

Yet, in mid-August, the new Prime Minister determined to seek the prorogation of Parliament - though he denied that was his plan later in the month - before finally despatching the Leader of the House of Commons to Balmoral to seek the Queen’s agreement. Parliament was prorogued amid disorderly scenes in September. Following court action in Scotland and England, the Supreme Court ruled unanimously on 24 September 24 that the prorogation was unlawful, stating ‘it is impossible for us to conclude, on the evidence which has been put before us, that there was any reason—let alone a good reason—to advise Her Majesty to prorogue Parliament for five weeks’. When Parliament sat again on 25 September, the Speaker confirmed that ‘the item relating to the Prorogation of

Parliament in the *Journal* of Monday 9 September' would be 'expunged' and the House would instead be recorded as 'adjourned' at the close of the business.<sup>19</sup>

### *Impartiality of the Civil Service*

In early 2018, the then Brexit Minister, Steve Baker, was forced to apologise to the House of Commons after criticising Treasury officials over their forecasts of the impact of Brexit. The Chief Secretary to the Treasury, Liz Truss, explicitly attacked the bureaucratic machine as 'gremlins of government' in June 2018. In October 2018, the then acting Cabinet Secretary Sir Mark Sedwill wrote to *The Times* defending the impartiality of the civil service following a series of anonymous attacks on civil servants over both the Brexit negotiations and Brexit implementation. Sedwill said that 'sniping' by 'anonymous sources' had to stop. He stated bluntly that 'civil servants have always trusted that our fellow citizens, whatever their views, know that we are doing our duty to implement the decisions of the government they elect'. ITV's political editor Robert Peston saw this as an 'incendiary' intervention: 'the most powerful civil servant in the UK is saying that if you don't like the government's Brexit policy, stop blaming civil servants – blame @Theresa\_may and her ministers'<sup>20</sup>.

The Ministerial Code places a responsibility on all ministers 'to uphold the impartiality of the civil service'. They should be professional in their dealings with the civil service and give due weight and respect to the advice that they are given. These issues are again reinforced in the Cabinet Manual. Despite Mark Sedwill's defence, repeated in April 2019, anonymous and on-the-record criticisms of civil servants continue. Some of these certainly derive from ministers and/or their special advisers. The leader of the First Division Association, Dave Penman wrote in July 2019, 'these selective leaks are increasingly becoming the modus operandi of a number of politicians (or, more frequently, those around them, to provide that all-important plausible deniability).' Penman also attacked opposition politicians, though anonymous civil servants quoted as doubting Jeremy Corbyn's health did their cause no favours<sup>21</sup>.

Penman's remarks came in the aftermath of the resignation of the U.K. Ambassador to the United States, Sir Kim Darroch, after his confidential comments on the U.S. President were leaked to British newspapers. Darroch resigned after the refusal of the successful Conservative leadership candidate, Boris Johnson, to endorse him during one of the leadership debates. The former U.S. ambassador to the European Union, Anthony Gardner, tweeted

We are truly living during a religious war. Decency goes out the window and there is no sense of outrage.

Meanwhile, reports have multiplied about civil service departures and a decline in morale<sup>22</sup>.

Senior civil servants can protect themselves against what they regard as inappropriate ministerial behaviour: the Permanent Secretary can ask for a written ministerial direction for a specified course of action. Since the 2016 referendum these have run into double figures, although analysis by the Institute for Government suggests that the number is not unprecedented, with 2009 seeing the highest number of directions issued, and a more secretive approach taken before 2011<sup>23</sup>.

### *MP's Interests*

If we return to the issue that originally brought Nolan into being, the remuneration of M.P.s and their declarations of interest, one story should be enough to illustrate the end of the Nolan consensus. In December 2018, Boris Johnson was told by the Commons Standards Committee to apologise for his 'over-casual' failure to declare £52,000 worth of expenses in an incident which the Parliamentary Commissioner for Standards said was 'a lack of attention to House requirements, rather than inadvertent error'. Despite this, ten years after the Commons expenses scandal, Mr Johnson, won the Conservative leadership and became Prime Minister<sup>24</sup>.

### *Conclusion*

The Nolan era is over. Ministers can perform badly but not be sacked. They can mislead Parliament but escape punishment. Cabinet and other ministers can breach collective responsibility with impunity. Details of Cabinet meetings and indeed Cabinet minutes can be leaked without any sanction. Ministers can undermine civil servants without consequence to

themselves. Ex-Ministers can ignore ACOBA rules and a year later become Prime Minister. Ministers sacked for leaking can rejoin the Cabinet within months.

Meanwhile, the Ministerial Code has been re-written with a Foreword by the Prime Minister which after an exhortation to make the UK 'the greatest place on earth' restates Nolan principles and despite the prior behaviour of many of his Cabinet states

There must be no bullying and no harassment; no leaking; no breach of collective responsibility. No misuse of taxpayer money and no actual or perceived conflicts of interest.

The Foreword then makes clear the primary objective of the Cabinet:

Crucially, there must be no delay - and no misuse of process or procedure by any individual Minister that would seek to stall the collective decisions necessary to deliver Brexit and secure the wider changes needed across our United Kingdom<sup>25</sup>.

In the so-called 'post-truth' world, academic research tells us that crises of legitimacy create space for demagogues to cast themselves as authentic speakers of truth to power, and give partisan or aggrieved publics cover to forgive breaches of norms that formerly would have been condemned<sup>26</sup>. Nolan depended on a shared political consensus about the norms which underpin standards in public life. That consensus depended on peer endorsement within Westminster, and peer pressure to uphold agreed standards; on a media that endorsed those standards and ways of operating, and refused to downplay breaches of norms simply because the politician affected shared their views on a particular issue; and it probably also depended on a public which had not yet reached the state of cynicism about parliamentarians that the 2009 expenses scandal produced. In the U.K. today, attitudes to Brexit determine attitudes to political norms. We live in a 'post-shame' world, Alastair Campbell has said<sup>27</sup>.

The historian Sir Anthony Seldon recently wrote of the need for a Truth and Reconciliation Commission and a Constitutional Convention to re-unite the country post-Brexit: this would also require statesmanship. Nolan, described by Peter Hennessy as 'a miniature, if informal, constitutional convention'<sup>28</sup> was a model for a different world. Truth and Reconciliation, a constitutional convention, statesmanship, a new Nolan: all depend now on the new Prime Minister. But is it likely that the necessary statesmanship will be shown by someone whose

track record of breaking rules on business appointments or reporting of financial interests suggests they regard these as matters for people other than themselves?

On 20 September, the chair of the Committee on Standards in Public Life wrote an open letter to all public office holders on the importance of upholding public standards. In it he said that 'leadership of standards must come from the top'. He warned it was vital that:

the tone of public debate should avoid abuse and intimidation, which have become increasingly widespread. Parliamentary democracy is under threat if those in public life and public office cannot express their views freely and without fear.

Five days later, the Prime Minister, on his return to the re-opened House of Commons, accused the Opposition of 'political selfishness and political cowardice', saying that they wanted to betray the people in support of the Benn-Burt 'surrender act'. He repeated the surrender act rhetoric on several occasions<sup>29</sup>.

We live in a post-Nolan age, and the new Prime Minister is its embodiment.

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<sup>1</sup> Quoted in Peter Hennessy, *The Hidden Wiring*, London: Victor Gollancz, 1995, p.181; Paul Bew, 'The Committee on Standards in Public Life: twenty years of the Nolan principles 1995-2015', *The Political Quarterly*, 86 (3) 2015

<sup>2</sup> Letter from Amyas Morse to Secretary of State, 4 July 2018, [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwjduZmzmLnjAhUEoVwKHcpUDcOQFjAAegQIABAC&url=https%3A%2F%2Fwww.parliament.uk%2Fdocuments%2Fcommons-committees%2Fwork-and-pensions%2Fcorrespondence%2F180704-Amyas-Morse--E-McVey-Universal-Credit.pdf&usg=AOvVaw2likEkO09Zu3kN0DPxp\\_wQ](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwjduZmzmLnjAhUEoVwKHcpUDcOQFjAAegQIABAC&url=https%3A%2F%2Fwww.parliament.uk%2Fdocuments%2Fcommons-committees%2Fwork-and-pensions%2Fcorrespondence%2F180704-Amyas-Morse--E-McVey-Universal-Credit.pdf&usg=AOvVaw2likEkO09Zu3kN0DPxp_wQ)

<sup>3</sup> Cabinet Office, 'Sir Alex Allan review: executive summary', 2 November 2018 <https://www.gov.uk/government/publications/sir-alex-allan-review-executive-summary>

<sup>4</sup> Letter to Boris Johnson from the chair of ACOBA, 8 August 2018, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/732866/180808\\_Boris\\_Johnson\\_The\\_Telegraph.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732866/180808_Boris_Johnson_The_Telegraph.pdf)

<sup>5</sup> Catherine Haddon, 'Loose Bindings: Cabinet collective responsibility and the Heathrow decision' 24 October 2016, <https://www.instituteforgovernment.org.uk/blog/loose-bindings-collective-cabinet-responsibility-and-heathrow-decision> ; House of Commons Library, 'Collective Responsibility', 15 November 2016, <http://researchbriefings.files.parliament.uk/documents/CBP-7755/CBP-7755.pdf>

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