



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Jonathan Slater, commission with Astana International Financial Centre under his Independent Consultancy.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown servants (the Rules) on taking up a role with Astana International Financial Centre (AIFC) under your independent consultancy. The material information taken into consideration by the Committee is set out in the annex.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during your time in office, alongside the information and influence you may offer AIFC, based on the information provided by you and your former departments.
3. 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

4. In this role you will provide support and advice for improving the quality of governance, delivery and organisational capability of Kazakhstan's central government - via AIFC. The Committee² considered this commission falls within the scope and advice previously offered on your consultancy, which you said would draw on your generic skills and experience to deliver advisory work for local government, public service organisations, and international governments.

¹ Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The Queen's Regulations and the Diplomatic Service Code.

² This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Isabel Doverty; Sarah de Gay; Dr Susan Liautaud; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir; and Lord Larry Whitty.

5. When considering this application, the Committee noted you did not meet with AIFC and there is no relationship between it and your former department, the DfE. Further, there is no overlap with your policy responsibilities and the DfE and the Cabinet Office confirmed you did not make any decisions specific to AIFC. Therefore, the Committee considered the risk of this work being seen as a reward for decisions made of actions taken in office as low.
6. Although there is no direct overlap with your time at the DfE, the Committee noted you would have had access to privileged information which may be seen to be of general use to any organisation you choose to join. However, the Committee took into account there are a number of mitigating factors that help to reduce the risks associated with your access to information and insight that may be seen to offer AIFC an unfair advantage:
 - you are prevented from drawing on privileged information and have an ongoing duty of confidentiality;
 - you have been out of office for more than 16 months, reducing the likelihood that any privileged information is sufficiently up-to-date;
 - the departments considered the risk associated with any specific information is low; and
 - the work you are seeking advice on is internal to AIFC, and you confirmed you will have no contact or dealings with government.
7. Given the nature of AIFC as a financial hub and this role's proximity to Kazakhstan's government, the Committee also sought a view from the Foreign, Commonwealth and Development Office (FCDO). The department confirmed it has no concerns about this appointment.

The Committee's advice

8. The Committee advises, under the government's Business Appointment Rules, that your commission with Astana International Financial Centre be subject to the conditions of your consultancy:
 - 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 Crown service;
 - for two years from your last day in Crown service, you should not become personally involved in lobbying the UK government and its arms' length bodies on behalf of those you advise under your independent consultancy (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 those you advise under your independent consultancy (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in Crown service you should not provide advice to any company or organisation 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 and its arms' length bodies; and

- for two years from your last day in Crown service, before accepting any commissions for your independent consultancy and or/before extending or otherwise changing the nature of your commissions, you should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.
9. 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.
 10. 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*'.
 11. You must inform us as soon as you take up this work, or it is announced you will do so. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.
 12. Please also inform us if you propose to extend or otherwise change the nature of this role as, depending on the circumstances, it may be necessary for you to make a fresh application.

Yours Sincerely,

William Young
Committee Secretariat

Annex - Material information

The role

1. AIFC's website says it is a '*...unique hub on the map of the financial world that brings together the best practices and opportunities offered by similar institutions around the globe*'. The AIFC seeks to position itself as a global centre for business and finance, connecting the economies of Central Asia, the Caucasus, EAEU, West China, Mongolia, Middle East and Europe. It works

with large financial institutions across these regions. AIFC's Management Council is chaired by the President of Kazakhstan. The AIFC's goal is to *'...contribute to the sustainable development of Kazakhstan and the entire Central Eurasia by offering the corporations and business people new opportunities for attracting investment, creating meaningful and effective projects in the industrial and services sector, and for creating new markets for goods and services'*.

2. You said you have been asked to carry out part-time, paid advisory work that relates to improving public services. This involves providing *'Support and advice for improving the quality of governance, delivery and organisational capability of Kazakhstan's central government'* - via AIFC. You said your work would help *'...improve public administration through advising on the introduction of a delivery unit, capability reviews, merit-based recruitment, training programmes etc.'* You confirmed the work you have been asked to do is all internal to Kazakhstan, and you will not be involved in any lobbying of the UK government. You said this appointment will not include contact with your former department or government more generally.

Dealings in office

3. You advised the Committee you did not meet with AIFC whilst in office. Further, you said you did not have any involvement in any policy development or decisions that would have been specific to AIFC, and held no commercial or contractual responsibilities relating to the organisation.

Department Assessment

4. The DfE and the Cabinet Office confirmed the details you provided, including that whilst in government you had no official dealings with AIFC.
5. The DfE and the Cabinet Office said as Permanent Secretary you *'...would have had access to a wide range of privileged information, though not specific to the proposed area of expertise'* you will use for this role. As more than 16 months have passed since you left your post, the departments said any information you had access to which could give AIFC an unfair advantage would likely now be out of date or in the public domain. The DfE and the Cabinet Office said your proposed work *'...focuses on improving public administration and delivery, as well as recruitment and training, not on education provision, so the privileged information he had access to as Permanent Secretary is likely to have very low, if any, relevance'*.
6. The DfE and the Cabinet Office confirmed you have no access to commercially sensitive information about AIFC.
7. The DfE and the Cabinet Office recommended the standard conditions. The departments noted AIFC *'...promotes financial investment and business interests (including via tax and operational incentives) in the region'* and *'...partners with major international financial institutions, such as Goldman Sachs, and countries in Central Asia, the Middle East and China.'* The DfE and

the Cabinet Office said your role will not '*...specifically involve education provision or policy*'. The departments said the conditions should note you will not be engaging with government, a new application is required if this changes, and remind you of your ongoing duty of confidentiality.

8. The FCDO confirmed it has no concerns about this appointment.