

From the Chairman



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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You asked for the Committee's advice about accepting a part-time, paid appointment as a consultant for Blenheim Capital Partners Ltd (BCP).

When considering your application, the Committee took into account that you had official dealings with BCP. Whilst in office, you were responsible for defence exports and met BCP in connection with Malaysia. Furthermore, the company's representatives were present at some meetings with Malaysian Government ministers or officials. However, the MOD does not have any formal contractual relationship with BCP and you did not have access to commercially sensitive information about any competitors. The Committee also noted that it is now five months since you left your ministerial office.

Taking into account all the circumstances, our advice is that we see no reason why you should not take up the appointment forthwith, subject to the following conditions:

- that you should not draw on any privileged information available to you as a Minister; and
- for two years from the same date, you should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.

It might be helpful if I add that lobbying is defined in the Business Appointment Rules in the following way: "Lobbying in this context means that the former Minister should not engage in communication with Government - including Ministers, special advisers and officials - with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted".

I should be grateful if you would inform us as soon as you take up the appointment, or if it

is announced that you will do so, either by returning the enclosed form or by emailing the office at the above address. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments which have not been taken up or announced. This could lead to a false assumption being made about whether you had complied with the Ministerial Code. Similarly, I should be grateful if you would inform us if you propose to extend or otherwise change your role with the BCP as, depending on the circumstances, it may be necessary for you to seek fresh advice.

Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website and include the main details of the application, together with the Advisory Committee's advice, in the regularly updated consolidated list on our website and in the next annual report.

Lord Lang of Monkton

Sir Gerald Howarth MP