



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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You asked for the Committee's advice about a new appointment as a Consultant and Board Member at First Data Corporation.

The Committee's remit

As you will be aware, it is the Committee's role to advise on any conditions that should apply to appointments or employment under the Government's Business Appointments Rules for Former Ministers (the Rules), which apply to former Ministers for two years after they leave office.

The Rules seek to counter suspicion that:

- a) the decisions and statements of a serving Minister might be influenced by the hope or expectation of future employment with a particular firm or organisation; or
- b) an employer could make improper use of official information to which a former Minister has had access; or
- c) there may be cause for concern about the appointment in some other particular respect.

When the Committee considers applications it must have in mind that Government has judged that it is in the public interest that former Ministers with experience in Government should be able to move into business or into other areas of public life, and to be able to start a new career or resume a former one. It is equally important that when a former Minister takes up a particular appointment or employment, there should be no cause for any suspicion of impropriety.

The Committee has now considered your application, as set out below;

Consultant and Brand Ambassador at First Data Corporation (First Data)

The Committee noted that First Data is a global payment technology solutions company headquartered in Georgia, United States. Its 'STAR' interbank network offers PIN-secured

debits at ATMs and in retail locations, at approximately six millions business locations and 4,000 financial institutions in 118 countries.

The organisation focuses on shaping the future of global commerce, making it simpler, safer and faster by connecting merchants with single source payments processing solutions.

When considering the application, the Committee also considered the following:

- You said your role will be paid and part-time, with a time commitment of two to three days per month.
- You describe your role as a consultant and brand ambassador and you will assist with business development and performing other duties as reasonably requested by the Board. As such, you will also sit on the Advisory Board of First Data. You confirmed your duties may include attending meetings and representing First Data with stakeholders; providing strategic advice and counsel to the CEO and Chairman, senior leadership team and the Board; offering international, contextual and geopolitical advice and analysis; and speaking at private and public events for and on behalf of First Data.
- You stated the role is not likely to include contact with Government, you have no commercially sensitive information about First Data or its competitors and you did not have previous official dealings with First Data.
- The Committee did note that as Prime Minister, you held meetings with other companies in the financial services sector, however these discussions focused on the broader economic policies being pursued by the UK Government and not on the detailed internal policies or strategies of individual companies.
- You indicated there were no other factors relating to this application that should be drawn to the Committee's attention.
- As you are the former Prime Minister, information was sought on your application from the Cabinet Office Permanent Secretary, John Manzoni. He confirmed that the Government has no links with First Data in its procurement frameworks and has no concerns about you taking up this appointment.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises the appointment 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 as Prime Minister;
- for two years from your last day in Ministerial office, you should not become personally involved in lobbying the UK Government on behalf of First Data Corporation, its partners or subsidiaries. You should not make use, directly or indirectly, of your contacts in Government to influence policy or secure business on behalf of First Data Corporation, its partners or subsidiaries.

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.

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.”*

I should be grateful if you would inform us as soon as you take up employment with this organisation, 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 that have not been taken up or announced. This could lead to a false assumption being made about whether you had complied with the Rules and the Ministerial Code.

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.

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.

The Baroness Browning

The Right Honourable David Cameron