



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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I am writing regarding your recent application to the Committee about your role as Chairman at Pathway Risk Management (Pathway) and further to my letter declining to give retrospective advice on the appointment.

I understand that you have provided some further information about your appointment and that whilst you do not expect to have any contact with the MOD, you do intend to have contact with other parts of Government, specifically the Home Office, to discuss matters relating to the work of private security companies.

You have made clear that Pathway would not be bidding for contracts with Government, however, the Committee does not agree that this means Pathway would not potentially stand to gain a competitive advantage should you succeed in influencing Government policy. In view of your position as Chair of an employer in the same sector, it may be perceived that you have a vested interest in discussions of this nature.

The Committee considers there is a significant risk that by meeting with a Home Office minister and officials it would be perceived that you are breaching the lobbying restriction in the Business Appointment Rules which explains that former Ministers *"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."*

The Committee has already made clear that it is not prepared to give advice on this role as it is a retrospective application. In light of the new information you have provided about your intended contact with the Home Office, the Committee would like to make clear that it does not consider that it would be appropriate for you to have any contact with Government to discuss issues relating to the private security industry, within the two year timeframe during which you are subject to the Business Appointment Rules. The Committee takes the view that should Pathway have contact with Government, you should have no personal involvement in this.

The Committee's letter will continue to state that it would expect you to refrain from making use, directly or indirectly, of privileged access derived from your role as a Minister, to influence government policy or secure business, on behalf of Pathway.

We will publish this letter, together with the letter on your retrospective application, on the Advisory Committee's website, and include the main details in both the regularly consolidated list on the website and in the next annual report.

The Baroness Browning

Sir Julian Brazier TD