



CABINET OFFICE

Alex Chisholm
Civil Service Chief Operating Officer
and Cabinet Office Permanent Secretary

Rt Hon Lord Pickles
Chair, Advisory Committee on Business Appointments

12 April 2021

Dear Lord Pickles,

Thank you for your letter dated 19 March 2021, which was subsequently resent on 22 March 2021.

As you set out in your letter, you wish to ascertain the facts as to why ACOBA did not receive an application under the Business Appointment Rules from Mr Bill Crothers in relation to his role at Greensill Capital.

Noting this issue dates back to as early as 2015, and the majority of people in post at that time have now moved on, our understanding of the issues is set out below. You will have seen that the Prime Minister has requested an independent review into the full facts of the wider question of Government's involvement with Greensill which I expect would establish and examine the full details. Nevertheless in the spirit of full transparency and given the important role ACOBA fulfils and your reasonable expectation to have the facts quickly I share with you below our understanding of the situation.

Mr Crothers took up a role advising the Board of Greensill Capital in September 2015 whilst he was employed as a Civil Servant. This was agreed via the Cabinet Office internal conflicts of interest policy, which advises on how to address real or perceived conflicts of interest.

Mr. Crothers then left the Cabinet Office and the Civil Service, at the end of November 2015. As he was already working in an advisory capacity to Greensill before he left the Civil Service, with this role captured under the conflicts of interest policy, no BAR application was required to be submitted to ACOBA at this time.

As the Business Appointment rules concern new appointments or employment that an individual takes up after they have left the Civil Service, under current policy, a BAR application would only then have been necessitated in the following two years (starting from November 2015) if Mr. Crothers' Greensill role changed *substantially* from the role he undertook in September 2015. If his role changed substantially, the obligation to seek ACOBA approval would have been on Mr. Crothers.

The Cabinet Office is fully committed to continuing to ensure that colleagues are aware of their obligations and there is a programme of work currently already underway to improve the awareness and efficacy of the rules.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alex Chisholm', written in a cursive style.

Alex Chisholm

Civil Service Chief Operating Officer & Cabinet Office Permanent Secretary