



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

Room G/8, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)

Website: <http://www.gov.uk/acoba>

Alex Chisholm  
Permanent Secretary and Chief Operating Officer for the Civil Service  
By email

13 April 2021

Dear Mr Chisholm,

Thanks for your letter in response to my request for an explanation around why Mr Crothers, the former Government Chief Commercial Officer at the Cabinet Office, did not seek advice under the Government's Business Appointment Rules (Rules) to join Greensill Capital (Greensill) as a Director in August 2016. ACOBA has also exchanged correspondence with Mr Crothers directly on the matter.

Mr Crothers and the Cabinet Office have both informed ACOBA that he joined Greensill in September 2015, as an advisor to its board, whilst he was still employed as a Civil Servant. This was agreed by the Cabinet Office under its internal conflicts of interest policy. The Cabinet Office confirmed that as the Government's Rules relate to new appointments or employment, an application would only be required for new appointments, or if a role substantially changed. Mr Crothers made applications to the Committee for other roles he took up after leaving office.

In this instance, Mr Crothers and the Cabinet Office have confirmed he followed a different internal process for his appointment to Greensill and considered additional advice was unnecessary. I would therefore be grateful if the Cabinet Office could provide the guidance on the conflicts of interest process, including:

- a. what is the process for approval?
- b. how is the integrity of decision making in office and any access to sensitive information (whether commercial/regulatory or policy related) in government service protected?
- c. is there a register of interests held, to record individual government staff working for outside organisations (commercial or other organisations)?

The lack of transparency around this part time employment with Greensill may have left the misleading impression that Mr Crothers had wilfully ignored the obligation to seek advice. I would therefore be grateful if Cabinet Office can confirm it will:

1. publish the conflicts of interest policy.
2. provide details of the historic and current numbers of individuals provided approval under his policy.
3. publish an appropriate register of interests, in line with the Government's current approach to transparency requirements - for example in relation to applications considered under the Government's Business Appointment Rules.

I am copying this letter to other relevant parties at the Cabinet Office and Mr Boardman<sup>1</sup>.

In line with the Committee's policy of transparency, we will be publishing correspondence on this matter.

The Rt Hon Lord Pickles

Alex Chisholm

Copied to: Darren Tierney, Director general, Propriety and Ethics, Cabinet Office; The Rt Hon Michael Gove MP, Chancellor of the Duchy of Lancaster and Minister for Cabinet Office; and Chloe Smith MP, Minister of State for the Constitution and Devolution.

---

<sup>1</sup>Nigel Boardman, non-executive board member of the Department for Business, Energy and Industrial Strategy - who is to lead independent investigation into matters surrounding Greensill Capital