



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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Dear Sir Iain,

Independent Consultancy - New Commissions

The Commission has considered your request to accept commissions with Wynyard Group, SQR Systems and Worldpay.

The Committee noted your assurance that, for all of these commissions, you have made it clear to the companies that you will not be engaged in lobbying the UK Government on their behalf, that you cannot draw on any privileged information, and that you will not engage in the provision of any advice relating to any bids or contracts with GCHQ. Additionally, you will keep both GCHQ and the FCO informed if any of this work has potential sensitivity internationally.

Given the nature of these commissions, the Committee also consulted with GCHQ, who raised no concerns. They noted that GCHQ does have a commercial relationship with SQR Systems, but that this started after you had left your role.

The Committee agrees that these commissions are permissible within the terms of your independent consultancy, which was defined as offering strategic advice on risk, primarily, but not exclusively, in the context of cyber security, and setting out how this relates to organisational and personal leadership.

The conditions that apply to your independent consultancy are:

- for two years from your last day of service, you should not become personally involved in lobbying the UK Government on behalf of any of your clients or those you advise;
- you should not draw on (disclose or use for the benefit of yourself or the organisations or persons to which this advice refers) privileged information available to you from your time in Crown service;

- for 12 months from your last day of service you should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of GCHQ; and
- for two years from his last day of service, before accepting any new commission you should make a case directly to the Committee to confirm that each individual commission would be permissible under the approved terms of the consultancy. (If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy you will be expected to submit a fresh application).

The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant “should not engage in communication with Government - including Ministers, special advisers and officials - with a view to influencing a Government decision or policy [including applications for awards or grants] in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted”.

I would be grateful if you could let me know when you take up any of these commissions, or if it is announced that you are to do so. This will enable the Committee to publish brief details on the regularly updated consolidated list on its website and in its next annual report. This letter may also be published (with relevant redactions of personal information).

Yours sincerely,

Catherine Millington
Committee Secretariat