



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

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You asked for the Committee's advice on accepting a part-time, paid appointment as a Managing Director at Kroll.

When considering your application, the Committee noted that your role will be to provide strategy for cross border business intelligence and asset recovery. The Committee also noted that you had had no official dealings with Kroll or its competitors while in ministerial office, and that you were not aware of any relationship between Kroll and the FCO. In addition, your former department had no reservations with this appointment.

We see no reason why you should not accept this appointment subject to the following conditions:

- you should not draw on any privileged information available to you from your time in Government; and
- for two years from your last day in ministerial office you should not become personally involved in lobbying the UK Government on behalf of Kroll, its parent company or its clients.

It might be helpful if I add that lobbying is defined in the Business Appointment Rules in the following way: "Lobbying in this context means that the former Minister should not engage in communication with Government – including Ministers, special advisers and officials – with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted".

*From the Chair*

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

Once an appointment has been publicly announced or taken up, we will include the main details, together with the Advisory Committee's advice on it and the date on which it was taken up, in both the regularly updated consolidated list on our website and in our annual report.

Baroness Browning

Mark Simmonds MP