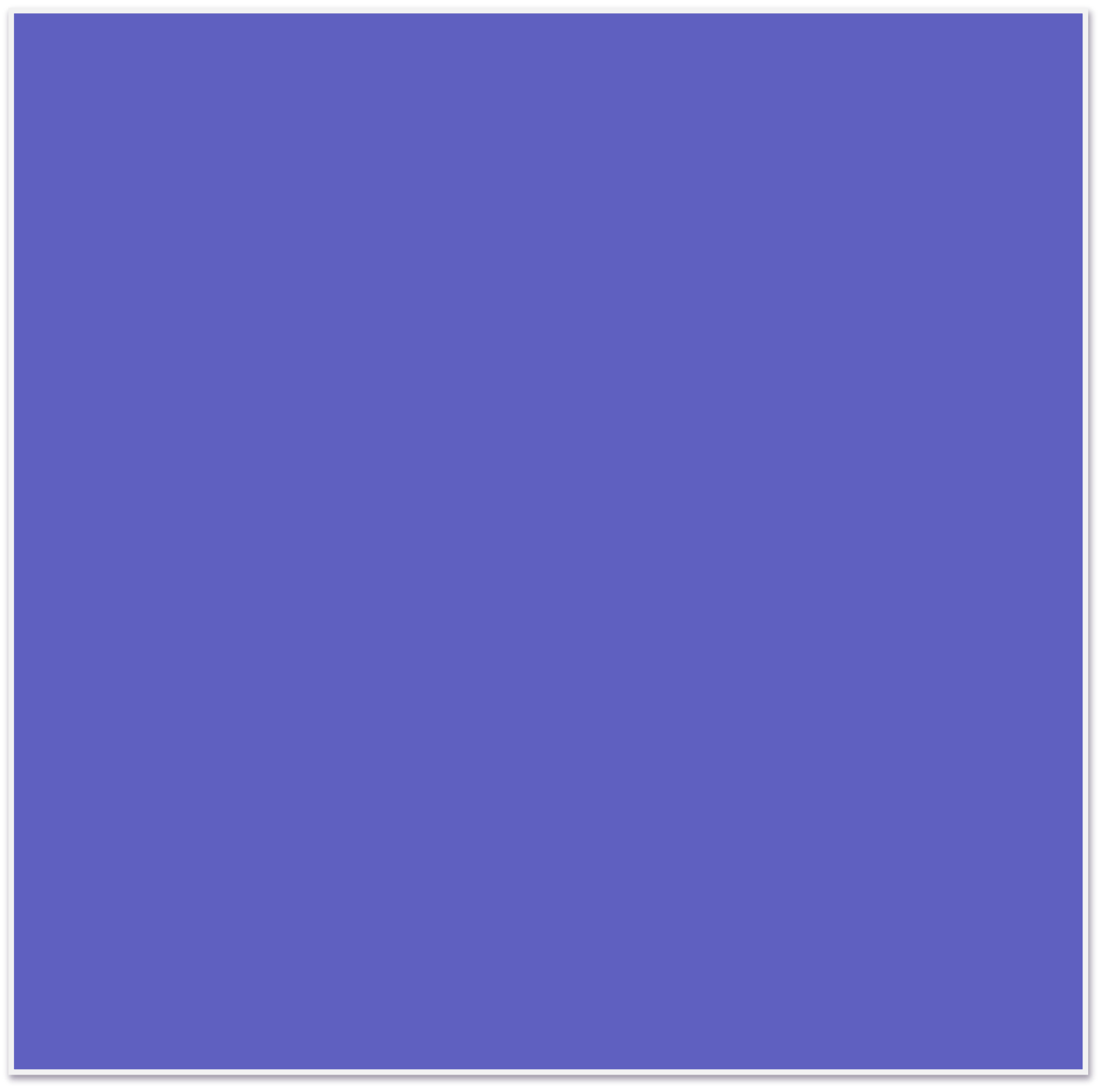




# Advisory Committee on Business Appointments

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## Sixteenth Annual Report 2014-2015





## **ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

26 August 2015

Dear Prime Minister,

### **SIXTEENTH ANNUAL REPORT**

This letter accompanies the sixteenth report of the Advisory Committee on Business Appointments. It covers the year to 31 March 2015 and is the first report since my appointment as Chair of the Committee in January 2015.

During 2014/15 the Committee continued to deal with a steady flow of applications from both former Ministers and Crown servants. The Committee is still seeing a historically high number of applications. It dealt with 49 appointments of former Ministers and 89 appointments of former Crown servants during the reporting period.

A reorganisation of the secretariat that supports us coupled, to a lesser extent, with the changes in the Committee's membership over the course of the year, meant that our response times, especially for applications from Ministers, lengthened somewhat at first (with the Committee dealing with 67% and 51% of Crown servants and Ministers' applications, respectively, within published timescales).

I am determined to improve on this record, without compromising due diligence; and am pleased to say that, at the time of writing, our response times have improved to 83% across both categories of application. However, the Committee is not complacent and, with our secretariat, we are currently developing proposals for streamlining our processes and improving response times further.

This is all the more important as, following the General Election, 2015/16 is likely to be a very busy year for the Committee. I wrote to Ministers in March 2015, as Parliament rose, reminding them of their responsibilities under the Business Appointments Rules; and the secretariat has factored the expected increase in applications over the coming months into its staffing arrangements.

This is also the Committee's first report under the most recent iteration of the Rules, issued by the Government in October 2014. I am keen to encourage and work with the Government, with the Cabinet Office in the lead, to raise awareness of the Rules and ensure they are implemented effectively. With this in

mind, I have had several productive meetings recently with Permanent Secretaries whose departments produce the highest numbers of applications. I will continue this programme of visits to departments over the coming year.

For our part, we have recently implemented, or are in the process of introducing, several changes both to enhance the information available to us as we consider applications, and to clarify the terms of conditions that may be attached to our advice. We have amended the application form for Ministers to ensure we systematically take into account any capacity in which they continue to represent the Government, such as a “tsar” or envoy. We are also amending the form to obtain more information about dealings an individual may have had while in office with the commercial sector into which he or she is proposing to move. We are elaborating on what is meant by the condition in the Rules around not drawing on privileged information, to provide applicants as well as their new employers (and, indeed, their former employers in the public sector) with greater clarity.

The Committee is always mindful of the right of individuals with experience of public administration to move into other sectors. However, it is our role to ensure that when individuals take up outside appointments there should be no cause for justified public concern, criticism or misinterpretation. Clearly, this can often involve fine judgements, and it is vital that we have as much information available to us as possible when making those judgements.

Finally, I should like to thank the members of the Committee who stood down during or at the very end of the reporting year. Sir Colin Budd, Lord Dholakia, Sir Hugh Stevenson, and Lord Walker have all provided outstanding service to the Committee over the last five years. In particular, I would like to thank Sir Hugh for assuming the role of interim Chair between April and December 2014, and the dedication and leadership he brought to that role.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Angela Browning'. The signature is written in a cursive style with a long horizontal flourish at the end.

The Baroness Browning

Advisory Committee on Business Appointments  
Sixteenth Annual Report  
2014-2015

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## **Part 1 - The Committee**

### **The Committee's Role**

1. The Advisory Committee on Business Appointments (the Committee) was established by the Prime Minister in 1975. It is an independent, advisory, non-departmental public body, whose sponsoring department is the Cabinet Office.
2. The Committee advises on the application of the Government's Business Appointments Rules on outside appointments<sup>1</sup> (the Rules), which apply to both Crown servants and Ministers after they leave office.
3. The Committee provides independent advice<sup>2</sup> on the application of the Rules in relation to the most senior Crown servants (Civil Servants at Director General-level and above, and their equivalents); and to all former Ministers of the UK, Scottish and Welsh Governments.<sup>3</sup>
4. During the reporting period the Committee advised on 89 appointments of former Crown servants and on 49 appointments of former Ministers.
5. Further details of how the Committee approaches its work are set out in Parts 2, 3 and 4 of this report.

### **Membership**

6. The Committee has eight members, appointed by the Prime Minister. The Conservative, Labour and Liberal Democrat parties nominated one member each; and the other five are independent members, appointed in accordance with the Commissioner for Public Appointment's Code of Practice. All members are appointed for a single non-renewable term of five years<sup>4</sup>.
7. The membership of the Committee during the reporting period was:
  - Mark Addison, independent member

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<sup>1</sup> Equivalent versions of the Rules are in place for Ministers, the Diplomatic Service, armed forces and intelligence agencies.

<sup>2</sup> Advice is provided to the Foreign Secretary if the applicant is from the diplomatic service, GCHQ or SIS; to the Defence Secretary for most Ministry of Defence staff, both civilian and military; to the First Ministers of Scotland and Wales in the case of staff from those Devolved Administrations; to the relevant Permanent Secretary if the applicant is a special adviser; and to the Prime Minister for all other Crown servants.

<sup>3</sup> Advice is provided direct to former Ministers.

<sup>4</sup> Sir Colin Budd and Lord Walker's terms were extended for several months during the reporting period while the Government ran the competition for their successors.

- Sir Alex Allan, independent member (from February 2015)
- Baroness (Angela) Browning, Conservative member (from June 2014) then also Chair (from January 2015)
- Sir Colin Budd, independent member (until February 2015)
- Lord (Navnit) Dholakia, Liberal Democrat member (until May 2014)
- Mary Jo Jacobi, independent member
- Lord (Michael) German, Liberal Democrat member (from July 2014)
- Baroness (Helen) Liddell of Coatdyke, Labour member
- Sir Hugh Stevenson, independent member (and interim Chair from April to December 2014)
- Lord (Michael) Walker of Aldringham, independent member

8. Sir Hugh Stevenson served as interim Chair of the Committee from April 2014 until December 2014, while the Government completed the open competition to find a successor to the previous Chair, Lord Lang. Baroness Browning (who had been the Conservative member of the Committee since June 2014) was appointed as the new Chair with effect from January 2015, following an open competition and pre-appointment scrutiny by the House of Commons Public Administration Select Committee.

9. In May 2014 Lord Dholakia, the Liberal Democrat member of the Committee, stepped down and was replaced by Lord German. In February 2015 Sir Colin Budd, one of the independent members of the Committee, was replaced by Sir Alex Allan.

10. At the end of the reporting period, Sir Hugh Stevenson and Lord Walker, both independent members of the Committee, stepped down from the Committee and were replaced by Terence Jagger and John Wood, with effect from 1 April 2015.

11. Biographies of the Committee's members are at Annex A.

## **Expenditure**

12. The Committee's expenditure figures are published annually in the Civil Service Commission's audited Accounts, reflecting the fact that the Civil Service Commission provides secretariat support for the Committee.<sup>5</sup> The figures in the audited accounts include the cost of accommodation and other

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<sup>5</sup> <http://civilservicecommission.independent.gov.uk/publications/annual-reports/>

service charges paid to the Cabinet Office, the Committee's share of which was approximately £60,000 in 2014-15.

13. Excluding the service charges mentioned above, the Committee's total expenditure for 2014/15 was £164,000. This compares with £137,000 in 2013/14 and £163,000 in 2012/13.
14. Committee members' fees of £8,000 per annum for the Chair and £3,000 for the other members remained unchanged and totalled £28,000 (compared to £27,000 in 2013/14 and £17,000 in 2012/13 (the differing totals being a reflection of vacancies in the Committee's membership in previous years)).
15. Staff costs remained the largest element of expenditure at £124,000 in 2014/15 (compared with £101,000 in 2013/14 and £122,000 in 2012/13).
16. Other expenditure included the cost of stationery and press officer contract.

## **Part 2 – The Committee’s Approach**

17. The Committee is constantly mindful of the strong public interest in those with experience in public administration, whether as Ministers or Crown servants, being able to move into posts within the private sector and elsewhere, and the benefits this brings to individuals, employing organisations and wider society. At the same time it is, clearly, important that there is no suspicion of impropriety in an appointment.

### **Restrictions**

18. Within this context, the Committee’s remit is to provide advice. This advice is given in the case of Ministers to the former Minister him or herself or, in the case of Crown servants, to his or her designated Minister or Permanent Secretary.<sup>6</sup> In discharging its remit it is necessary, therefore, for the Committee to have regard to the need to balance the rigorous and consistent application of the Rules with the rights of individuals to change employment. This means that any restrictions must be fair and proportionate, so that the process commands the respect both of the public and the individuals who submit applications.
19. In order to be fair and reasonable, each case is judged on its merits. This can include returning to an applicant, or their former department, for additional information to assist the Committee in forming its advice. It can also include the Committee meeting an applicant, particularly in cases where the applicant wants to discuss the Committee’s provisional advice in more depth.
20. Very exceptionally, the Committee may advise that an appointment is unsuitable. However, past experience has shown that in those rare cases when the Committee indicates informally to an applicant that it is likely to consider a particular appointment to be unsuitable, it is often the case that the application is withdrawn or amended to such an extent that the Committee’s provisional advice can be revised. As only appointments which are taken up are published, the Committee’s website and reports do not usually show any unsuitable appointments. In 2014/15, the Committee did not advise, either formally or informally, that any appointments were unsuitable.

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<sup>6</sup> As explained earlier, the decision-maker for cases relating to the diplomatic service, GCHQ and SIS is the Foreign Secretary; for most civilian and military staff in the Ministry of Defence it is the Defence Secretary; for Crown servants working in the Scottish or Welsh Devolved Administrations, it is the relevant First Minister; for special advisers, it is the relevant Permanent Secretary; and for all other Crown servants it is the Prime Minister.



## **Openness**

21. The Committee publishes its advice on all appointments it has considered that are subsequently taken up or announced. It makes public as much detail as it is able, after taking into account its responsibility to individual applicants under data protection legislation.
22. It is through this transparency, as recommended by the Committee on Standards in Public Life, that all those involved in the business appointments process (including applicants, government departments, outside employers and the Committee itself) are accountable to the public. Equally, if approached about an individual who has not submitted an application to the Committee when he or she should have done under the Rules, the Committee will also make clear that no application has been received.
23. The Committee welcomes the Government's commitment, in the latest iteration of the Rules, to greater transparency in relation to the outside appointments of more junior Crown servants, which are considered internally by departments and do not come before the Committee for consideration.
24. In November 2014 the Committee transferred its website to the gov.uk portal, which now hosts the great majority of UK Government departments, agencies and public bodies. Initial feedback received following this transition was that the new arrangements were more user-friendly for applicants and departments, but less useful for those seeking records of the Committee's advice, such as journalists. As transparency is crucial to the Committee's work, the secretariat worked closely with the Government Digital Service to resolve these issues. We are now content that the Committee's pages on gov.uk meet the needs of the full range of interested parties but will continue to keep this closely under review.
25. Since March 2010 the minutes of all Committee meetings have been published. In 2014/15 the Committee met four times to discuss a range of issues. The Committee will continue to publish minutes of future meetings once it has approved them.
26. As a public authority, the Committee is required to respond to requests for information, in accordance with the Freedom of Information Act 2000. During the reporting period 22 requests were received and responded to.

27. The Committee has a Code of Practice, which is published. During the reporting period it agreed some changes to the Code, intended to make it clearer and more able to function effectively as a stand-alone document. The Committee plans to undertake a more fundamental review of its governance arrangements in 2015/16.
28. It also maintains a register of its members' interests which is available on its website. Committee members follow a strict policy of declaring any individual interests related to a case and, if necessary, recusing themselves. The Committee publishes such details alongside its advice on the relevant case.

## **Part 3 - Ministers**

### **Introduction – the Ministerial Codes**

29. The Ministerial Codes for the UK Government, Scottish Government and Welsh Government all require former Ministers to seek the Committee's advice before taking up appointments in the two-year period after they leave Ministerial office.
30. All three Codes are based on the premise that it is in the public interest for former Ministers with experience in Government to be able to move into business or into other areas of public life, and be able to start a new career or resume a former one. It is, however, equally important that when a former Minister takes up a particular appointment or employment, there should be no cause for any suspicion of impropriety.
31. In the reporting period, the Committee advised 19 former Ministers in relation to 49 appointments. This includes advising on three commissions under the terms of independent consultancies already agreed by the Committee.

### **The Process**

32. The Committee provides its advice direct to the former Minister. It aims to provide its advice within 15 working days of receipt of an application. However, the complexity of some cases, and the need to seek advice from the Minister's former department(s), means it is not possible for all cases to be fully considered within this timeframe. During the reporting period, the Committee provided its advice to former Ministers within 15 working days in 51% of cases (although 67% received their advice within five additional days of the deadline). This compares with 72% in 2013/14, and 85% in 2012/13.
33. The lengthening of response times during 2014/15 was due to the transitional effects of a reorganisation within the secretariat and, to a lesser extent, the changes in the Committee's membership over the course of the year. Since the end of the reporting year, response times have improved and we aim to sustain this improvement in the year ahead. Separately, the Committee is developing proposals for streamlining its processes and improving its response times further.

34. All former Ministers are written to when they leave office – and again after one year of leaving – to remind them of the need to ask the Committee for advice on all applications for two years after leaving office.
35. Former Ministers are asked to complete an application form, which is available on the Committee’s website. We ask applicants to provide us with as full a picture of the proposed appointment as possible so that we can provide fully informed advice. We may also seek further confidential evidence from different sources, for example the Minister’s former department or the proposed employer or their competitors. All applications are treated in strict confidence and remain confidential until appointments are taken up or publicly announced.
36. The advice to former Ministers will typically range from unconditional approval to a waiting period and/or a lobbying ban of up to two years. As a general principle, former Ministers will have to observe a two-year ban on lobbying the particular Government they served (i.e. UK, Scottish, or Welsh). The two-year lobbying ban may be waived or reduced by the Committee if it considers this to be justified by the particular circumstances of an individual application. Furthermore, former Cabinet members of the UK Government will have a minimum three-month waiting period after leaving office, although this can be waived by the Committee if justified by the circumstances of the case. In exceptional circumstances, the Committee can recommend that a particular appointment is unsuitable.
37. The Committee’s advice is normally published as soon as the former Minister has advised the Committee that he or she has taken up or announced an appointment. We do not publish our advice where an appointment is subsequently not taken up.
38. The Committee will consider requests for continuing confidentiality once an appointment has been taken up, but a compelling case must be made to the Committee for doing so. The Committee will give no undertaking longer than three months, at the end of which the situation is reviewed.
39. Further information about the Committee’s advice on outside appointments of former Ministers in 2014/15 is at Annexes C and E.

## **Part 4 – Crown Servants**

### **The Rules**

40. The key principles of the Rules for civil servants – which apply equally to civil servants serving the UK Government, the Scottish Government and the Welsh Government – are designed to uphold the core values in the Civil Service Code, of integrity, honesty, objectivity and impartiality<sup>7</sup>.
41. Equivalent versions of the Rules are in place for the diplomatic service, intelligence agencies, and armed forces (members of which, along with civil servants, are referred to as Crown servants for the purposes of this report).
42. It has been the view of successive Governments that it is in the public interest for people with experience of public administration to be able to move into business or other bodies outside central government, and such movement should not be frustrated by unjustified public concern over a particular appointment. It is equally important that when a former Crown servant takes up an outside appointment there should be no cause for justified public concern, criticism or misinterpretation.
43. The purpose of the Rules is to maintain trust in public services and in the people who work in them, and in particular to avoid any suspicion that an appointment might be a reward for past favours. They are also intended to mitigate the risk that an employer might gain an improper advantage by appointing a former official who holds information about its competitors or about impending Government policy.
44. The Rules apply to all Crown servants, including special advisers. The Committee is responsible for providing independent advice<sup>8</sup> on the application of the Business Appointment Rules to the most senior Crown servants who wish to take up appointments within two years of leaving Crown service.
45. Departments deal with more junior applications under their own arrangements. Permanent Secretaries are responsible for the operation of the Rules in their departments.

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<sup>7</sup> As temporary, political, appointees special advisers are exempt from the requirements to behave with objectivity and impartiality.

<sup>8</sup> To, variously: the Prime Minister; Foreign Secretary; Defence Secretary; First Ministers of Scotland and Wales; and departmental Permanent Secretaries.

46. In the reporting period, the Committee advised 41 Crown servants in relation to 89 appointments. This includes advising on 23 commissions under the terms of independent consultancies already agreed by the Committee.

### **The Process**

47. For the applications it considers, the Committee aims to provide its advice within 20 working days of receiving a fully completed application form. As each case is considered on its individual merits it is not possible to achieve this target in all cases and some will necessarily take longer. During this reporting year, 67% of cases were dealt with within the 20-day target (although 85% of cases were dealt with within five additional days of the deadline). This compares with 79% in 2013/14 and 87% in 2012/13. As with Ministerial applications, our turnaround times have improved since the end of the reporting period and we are committed to sustaining this improvement throughout 2015/16.

48. All applicants must complete a standard application form which is available on the Committee's website. The form asks them to provide details of their current and previous posts as well as information on the proposed appointment including whether or not it was advertised, and if it will involve dealings with their former department or government more generally. Applicants must also state if they have had any contractual or official dealings with the prospective employer or competitors of the prospective employer over the previous two years; and if they have been involved in policy development or the award of grants that could affect either the prospective employer or its competitors.

49. Applicants must submit the application to both their countersigning officer and the department's HR division for them to provide their views on the application. The completed application is then sent direct to the Committee. The Committee relies on the information provided by the department and countersigning officer to inform its consideration of an application. The Committee considers each case individually against the Rules. It collects wider evidence where necessary, for example it might seek the views of another government department or the Cabinet Office, as "owner" of the Rules. In some instances the Committee will meet applicants to discuss the proposed appointment further.

50. The Committee will then reach a view on whether there should be any restrictions on the applicant taking up the proposed appointment. The advice of the Committee will typically range from unconditional approval to a waiting period, a ban on advising on bids or contracts relating to an applicant's former department and/or a lobbying ban. As a general principle, former Crown servants who apply to the Committee will have to observe a two-year ban on lobbying the particular administration they served (UK, Scottish or Welsh). Former Crown servants at the equivalent of Permanent Secretary-level or above will have a minimum three-month waiting period after their last day of paid service, although this can be waived or reduced by the Committee if justified by the circumstances of the case. As with Ministers, the Committee may judge an appointment to be unsuitable and can advise the Prime Minister to this effect.
51. Once the Committee has agreed its advice it writes to the relevant final decision-maker (whether Minister or Permanent Secretary), who then considers the application and the Committee's recommendation. Once he or she has made the decision the Committee is informed, as are the department and applicant.
52. The applicant is then responsible for informing the Committee when he or she has taken up the appointment, or it has been announced. Once the Committee has been informed it will publish the details of the appointment and its advice on its website.
53. Until an appointment is taken up or announced, the Committee undertakes to treat all applications confidentially. It does not publish its advice on appointments not taken up.
54. Further information about the Committee's advice on appointments taken up by former Crown servants in 2014/15 is at Annex C and D.

### **Changes to the Rules During the Reporting Period**

55. The Government amended the Rules for Crown servants in October 2014 and some of the changes had implications for the Committee's work. The current version of the Rules can be found here:  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/382937/Business\\_Appointment\\_Rules\\_2014.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/382937/Business_Appointment_Rules_2014.pdf)

56. The Rules now specify that only applications from special advisers “of equivalent standing” to civil servants at Director General (Senior Civil Service pay band 3) level and above are to be considered by the Committee. As Civil Service and special adviser pay bands do not mirror each other exactly, departments now need to exercise greater judgement as to when certain special advisers’ applications should be referred to the Committee. The Committee believes it is also desirable for there to be a central point of guidance for departments to call on in this situation, to ensure that a consistent approach is taken across Government. Logically, this should be the Cabinet Office, as “owner” of the Rules. However, the Committee and its secretariat are also ready to offer their advice, if required.
57. The Rules permit the Committee to qualify the lobbying condition to make clear that this restriction need not prevent individuals communicating with Government on matters that are an integral part of the normal course of business for their new employers. This is a qualification that the Committee had agreed to, on rare occasions, before the Rules were amended. While noting this change in the Rules, the Committee has agreed to continue with its policy of applying the qualification sparingly, as it is keen not to contribute to any reduction in the scope or impact of the Rules (or any perception that this is the case).
58. The Rules now state that retrospective applications will not normally be accepted. The Committee welcomes this change, as it had previously expressed its view that it needed to be free to offer the most appropriate advice in any situation without it appearing to be constrained by an appointment already having been announced, or an individual already having signed a contract or taken up a post. Although this, and the other changes referred to in this section, apply to the Rules for Crown servants, the Committee has agreed to take the same approach with retrospective applications submitted to the Committee directly by former Ministers.
59. The Committee notes that the Rules allow for a department to continue to pay former civil servants or special advisers who are required to observe a waiting period before taking up an outside appointment. However, the Committee has agreed that whether or not such a payment had been, or was likely to be, approved would not form part of the Committee’s consideration when offering its advice.



## Annex A

### Biographies of Committee Members

**Mark Addison** joined the Civil Service in 1978 and worked in a number of central Government Departments in a range of operational and policy roles. He was the Chief Executive of the Crown Prosecution Service (1998-2001) and held various senior positions in the Department for Environment Food and Rural Affairs (2001-2006). After leaving the Civil Service in 2006 Mark took on a number of portfolio roles. He was a Civil Service Commissioner (2007-2012) and was the First Civil Service Commissioner and Commissioner for Public Appointments on an interim basis from 1 January to 31 March 2011. He was a Non-Executive Director of Salix Finance Ltd (2006-11) and at the National Archives (2007-2012). He has been a Visiting Professor at the Cass Business School and a Member of Council at the Consumers' Association since 2010. He is currently a Public Appointments Assessor for the Commissioner for Public Appointments and was Chair of the Nursing and Midwifery Council until the end of 2014.

**Sir Alex Allan** had a long career in the Civil Service, including roles as Principal Private Secretary to the Chancellor of the Exchequer and to the Prime Minister; High Commissioner to Australia; the Government's "e-Envoy"; Permanent Secretary at the Ministry of Justice; and Chairman of the Joint Intelligence Committee. He is currently the Prime Minister's Independent Adviser on Ministers' Interests and a member of the QC Appointments Panel.

**Baroness (Angela) Browning** was MP for Tiverton (1992-1997) and for Tiverton and Honiton (1997-2010). She was Parliamentary Private Secretary to Michael Forsyth as Minister of State at the Department of Employment (1993-1994) and Parliamentary Secretary at the Ministry of Agriculture, Fisheries and Food (1994-1997). She was made a life peer in 2010 and was Government Spokesperson for the Home Office in the House of Lords, and Minister of State for Crime Prevention and Anti-Social Behaviour Reduction at the Home Office in 2011. She is a member of the Select Committees on the Arctic and Agriculture and the Liaison Committee. She has also been an Electoral Commissioner (2010-2012). Before entering Parliament, she was a teacher, auxiliary nurse, and management consultant.

**Sir Colin Budd** joined the Diplomatic Service in 1967. During his career he served in Warsaw, Islamabad, The Hague and Bonn, and was for 3 years Chef de Cabinet to the Vice-President of the European Commission. In the UK he was Private Secretary to two Cabinet Ministers and chaired the Joint Intelligence Committee (1996-1997). After four years as Deputy Under Secretary of State (Europe and Economic) at the Foreign and Commonwealth Office, he spent five years as HM Ambassador to The Netherlands before retiring in 2005. He was a Member of the Commission for Racial Equality (2006-2007), and of the QC Selection Panel (2009-2013). He is currently on the Board of the London School of Economics' IDEAS centre for the study of international affairs.

After spending his early years in Tanzania and India, **Lord (Navnit) Dholakia** came to Britain to study in Brighton, where he became active in the Liberal Party. While Chair of Brighton Young Liberals, he was elected to Brighton Borough Council (1961-1964). In 1966 he became Development Officer for the National Committee for Commonwealth Immigrants, and ten years later he was appointed to the Commission for Racial Equality. His interest in criminal justice and penal affairs is reflected in his work with the Sussex Police Authority, the Police Complaints Authority, the Howard League for Penal Reform and his current role as President of Nacro. He was made a life peer in 1997 and has served as a Liberal Democrat Whip (1997-2002) and the Party's Home Affairs Spokesman (2002-2004). After four years as President of the Liberal Democrats, he was elected joint Deputy Leader of the party in the House of Lords in 2004 and has been its sole Deputy Leader in the Lords since 2010. He is also a Privy Councillor.

**Lord (Michael) German** led the Liberal Democrat group on Cardiff City Council for 12 years (1983-1995). (He was awarded the OBE for political and community service in Wales in 1997.) In 1999 he was elected to represent South Wales East in the first ever elections for the National Assembly for Wales, having been elected by his Party to be its leader in waiting for the National Assembly the year before. In 2000 he took the Party into a coalition government, holding the post of Deputy First Minister, and also various ministerial portfolios including the Economy, Europe and Rural Affairs. He led the Party in the National Assembly until December 2008, latterly chairing its Environment and Sustainability Committee. In 2007 he became the overall leader of the Welsh Liberal Democrats - a post which until then had been designated for an MP at Westminster. In 2010 he left the National Assembly to join the House of Lords.

**Mary Jo Jacobi** is a consultant on reputation, brand and crisis management and international business strategy and a non-executive director of The Weir Group plc, Mulvaney Capital Management LLC and Panafsat. She held senior executive positions in the UK at Royal Dutch Shell, Lehman Brothers and HSBC Holdings and in the United States at BP America and Drexel Burnham Lambert. She was also a Non-Executive Director of Tate and Lyle plc. Mary Jo was appointed Assistant United States Secretary of Commerce by President George H W Bush and served as Special Assistant for Business Liaison to President Ronald Reagan. She also served on the staff of the US Senate Committee on Commerce. From 2005-2010 she was a Civil Service Commissioner in Great Britain. She is a member of the University of Leeds Business School International Advisory Board and has been a Visiting Fellow of the University of Oxford Centre for Corporate Reputation since 2009. She is a Fellow of the RSA and a lifetime member of the Royal Institution of Great Britain and the Worshipful Company of International Bankers, and she chairs the Sir Heinz Koeppler Trust and is a Board member of the Wilton Park USA Foundation.

**Terence Jagger's** early career was in investor relations/financial communications and strategy development in industry, with Shell, American Express, Burmah Oil and Unigate. After a Masters degree in Finance, he joined the civil service in 1995, where he worked in the Ministry of Defence until 2011. His roles included managing the PFI programme, leading the QinetiQ privatisation, Director Financial Management, Command Secretary to the RAF, and political advisor to the NATO commander in Afghanistan (2006-7). From 2011 to 2015 he was Chief Executive of Crown Agents, the international development company working in Africa and Asia, where he was also deputy Chairman of Crown Agents Bank and Crown Agents Investment Management. He has previously served as a non-executive or trustee of the UK-Japan 21st Century Group, the Met Office, the Gloucestershire and the London Wildlife Trusts, and the London Library, and as Chair of EUNIDA.

**Baroness (Helen) Liddell** of Coatdyke was MP for Monklands East (1994-1997) and then for Airdrie and Shotts until 2005. She held a number of Ministerial positions including Economic Secretary to the Treasury, Energy Minister and Minister of State for Transport before becoming Secretary of State for Scotland (2001-2003). She was British High Commissioner to Australia until 2009 and was made a life peer in 2010. Baroness Liddell was part of the review of the circumstances surrounding the helicopter crash on the Mull of Kintyre at the request of the Coalition Government and was on the Joint Committee on the Prevention of Terrorism. She is Chairman of the Good Governance Group (G3), a Member of the Advisory Board of PWC, and a Non Executive Director of the Offshore Renewable Energy Catapult.

**Sir Hugh Stevenson** began his business career at Linklaters & Paines, solicitors. He joined the investment bank, SG Warburg & Co, in 1970 and was a director of SG Warburg Group plc (1987-1995). He was Chairman of Mercury Asset Management Group plc (1992-1998), the Institutional Fund Managers Association (1998-1999), Equitas Ltd (1998-2009) and The Merchants Trust plc (2000-2010), and a Non-Executive director of Standard Life plc (1999-2008). Hugh was also a Non-Executive Director of the Financial Services Authority (2004-2010), serving as Deputy Chairman during his final year. He is a trustee of a number of charitable trusts.

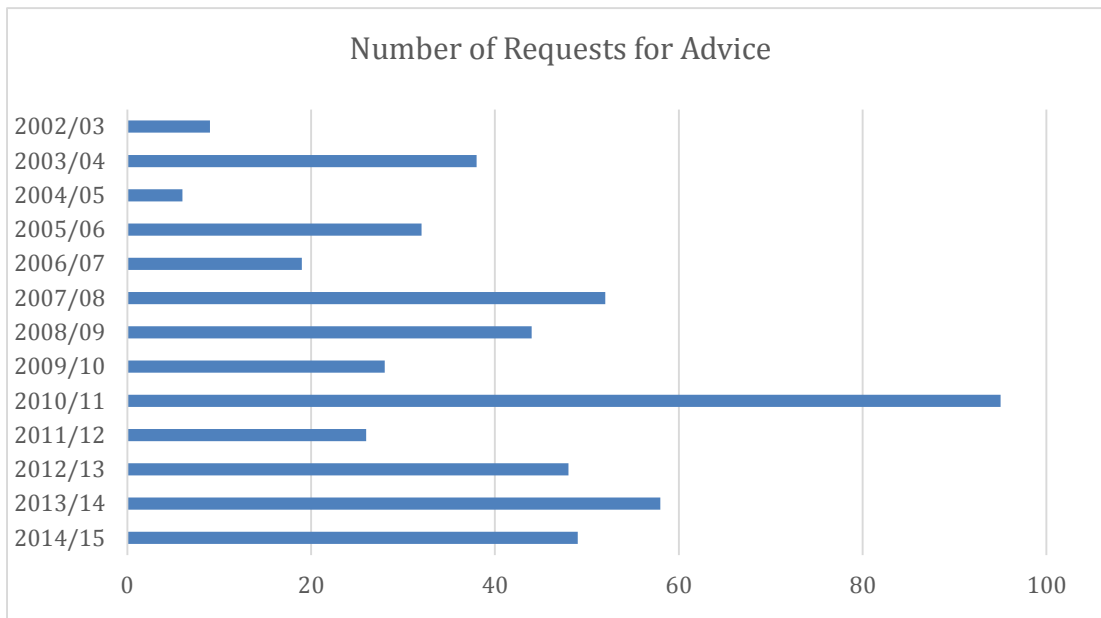
After a brief spell as a teacher, **Lord (Michael) Walker** joined the Army in 1966. He served in Cyprus, Gibraltar, Northern Ireland and Germany before taking command of the 2<sup>nd</sup> Infantry Division. Following his posting as Assistant Chief of the General Staff, he was appointed Commander of NATO's Allied Rapid Reaction Corps in 1994. When the Corps was deployed to the Balkans in 1995 he became the first officer to command the land component of the NATO-led Implementation Force. He returned to the MOD in 1997 as Commander in Chief, Land Command, and was promoted to Chief of the General Staff (the professional head of the British Army) in 2000. In 2003 he became Chief of the Defence Staff (head of all British Armed Forces), a post he held for three years before retiring and receiving a life peerage in 2006. He was subsequently appointed Governor of the Royal Hospital Chelsea, stepping down in early 2011.

**John Wood** joined Herbert Smith, now Herbert Smith Freehills LLP, the city and international law firm, in 1972 and was a partner from 1982 to 2007. From 2008 to 2014 he was a legal board member of the Charity Commission and its interim chair in 2012.

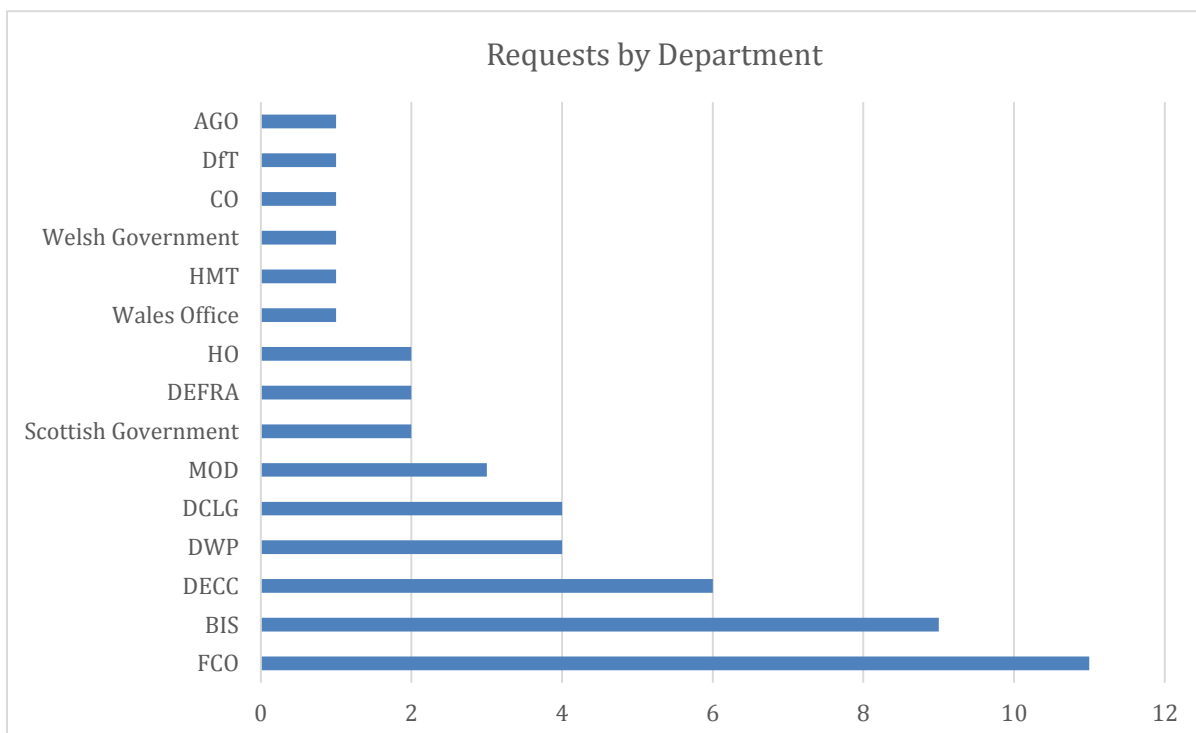
## Annex B

### Appointments taken up by former Ministers

#### Requests for Advice on Appointments since 2002



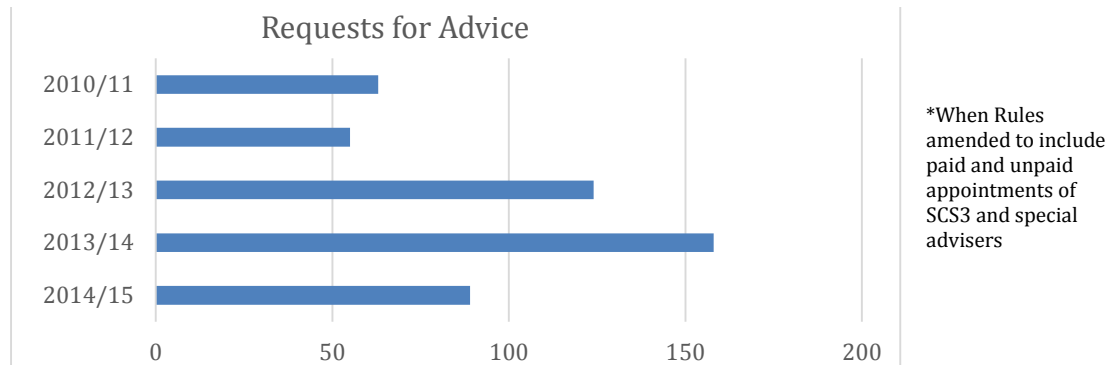
#### Requests for Advice by Department - 2014/15



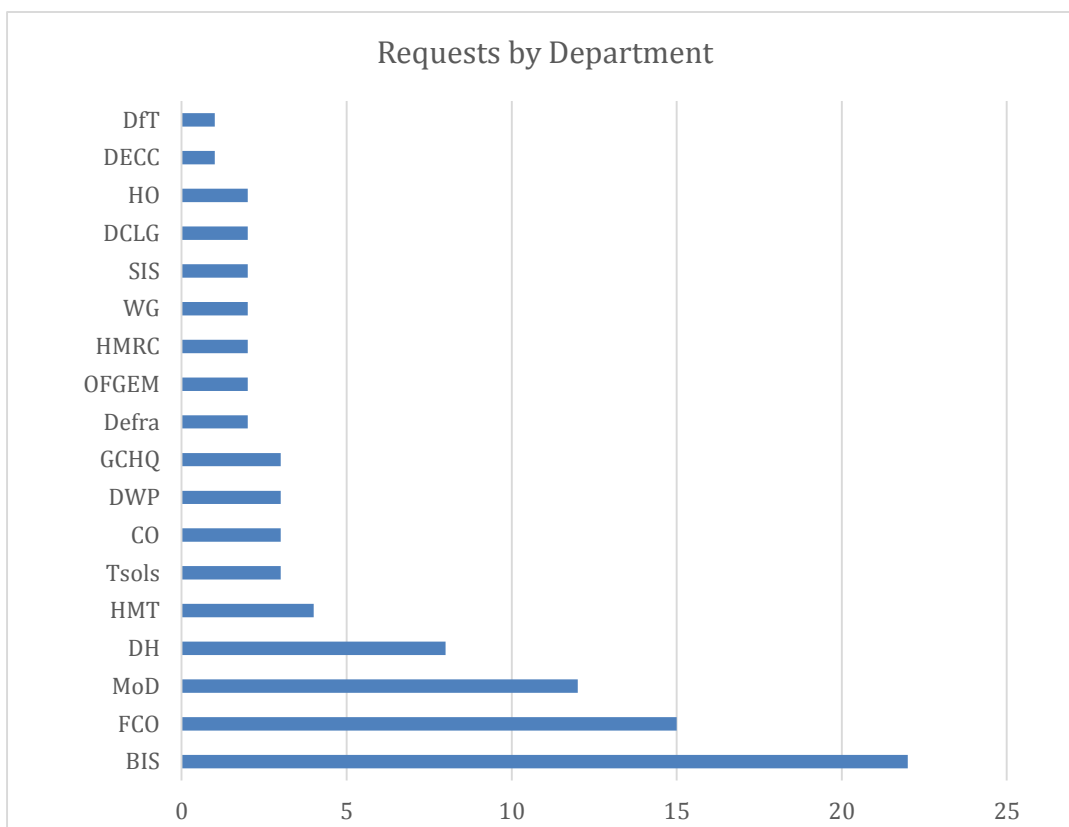
## Annex C

### Appointments taken up by former Crown servants

#### Number of Requests for Advice on Appointments since 2010\*



#### Requests by Department – 2014/15



## **Annex D**

### **The Committee's advice on appointments**

Please note: if an appointment is not listed here, it does not necessarily mean that approval has not been given, as we release information only when we are informed that an appointment has been taken up or announced.

## **Tera Allas**

### **Director General for Strategic Advice, Department for Business, Innovation and Skills**

Tera Allas left her role as Director General for Strategic Advice at the Department for Business, Innovation and Skills in January 2014.

#### **1. Board Member, Innovate UK**

Mrs Allas sought advice on accepting a role as a Board Member for Innovate UK, an executive non-departmental public body sponsored by BIS.

The Committee noted that the nature of Innovate UK meant that the new role might involve contact or dealings with her former department, primarily so that board members understand the broader context in which Innovate UK operates. However, the role will not include contractual or financial dealings with BIS and Mrs Allas did not have access to commercially sensitive information about any competitors of her new employer.

The Prime Minister accepted the Committee's advice that the application be approved subject to the conditions that:

- she should not draw on privileged information available to her as a Crown servant; and
- for two years from her last day of service, she should not become personally involved in lobbying the UK Government on behalf of her new employer or its clients.

The [letter](#) containing the final decision was sent in March 2015 and she took up the role later that month.

Baroness Liddell recused herself as she has had dealings with Innovate UK.

#### **2. Board Observer, Green Investment Bank**

Mrs Allas sought advice on accepting an appointment as a Board Observer for the Green Investment Bank as part of the Shareholder Executive's Women on Boards scheme.

The Prime Minister accepted that Committee's advice that this application be approved subject to the conditions that:

- she should not draw on privileged information available to her as a Crown servant; and
- for two years from her last day of service, she should not become personally involved in lobbying the UK Government on behalf of her new employer or its clients.

The [letter](#) containing the final decision was sent in February 2015 and she took up the role later that month.

### **3. Senior Adviser, Vivid Economics**

Mrs Allas sought advice on accepting an appointment as a Senior Adviser to Vivid Economics Ltd.

The Committee noted that Mrs Allas, while at BIS, led the department's work on industrial strategy. This included a partnership strategy for the professional business service sector, which could, in theory, have an impact on consultancies such as Vivid Economics. However, she had not had direct involvement in shaping or commenting on the content of sector-specific strategies, nor had she had any contractual dealings with Vivid Economics, any access to commercially sensitive information about competitors, or any involvement in regulatory work that could affect her new employer or its competitors.

The Prime Minister accepted the Committee's recommendation that the application be approved subject to the following conditions:

- Mrs Allas should not draw on privileged information available to her as a Crown servant;
- for two years from her last day in Crown service, she should not become personally involved in lobbying the UK Government, Ministers or Crown servants, including Special Advisers, on behalf of any of her employers/clients; and
- for the same period, if her role changes with VE she must seek confirmation directly from the Committee directly that any projects she accepts that are within the policy remit of BIS are permissible under the terms of her appointment before taking them up. If, after enquiry, the Committee takes the view that a project is, or may be, outside the terms of the appointment she will be expected to submit a fresh application.

The [letter](#) containing the final decision was sent in July 2014.

### **4. Commissions under independent consultancy**

Mrs Allas set up as an [independent consultant](#) in April 2014. Since setting up as an independent consultant, she has asked for the Committee's advice on accepting a number of commissions with:

- [Organisation for Economic Cooperation and Development](#)
- [Vivid Economics](#)
- [States of Jersey](#)
- [Monitor](#)
- [Shareholder Executive - BIS](#)
- [OECD Innovation Strategy](#)



On each occasion the Committee has agreed that the commissions fall under the terms of her independent consultancy and can be accepted, subject to the conditions imposed on the consultancy.

## **Michael Anderson**

### **Director General for International and Immigration Policy, Home Office**

Michael Anderson left his role as Director General for International and Immigration Policy at the Home Office in March 2015.

#### **1. Senior Vice President of External Affairs, Government Relations and Security, Kosmos Energy**

Mr Anderson sought advice on accepting a role at Kosmos Energy. Kosmos Energy is an international oil and gas exploration and production company. The appointment is paid and full time. In this role Mr Anderson will be involved in external affairs, government relations (US), communications and security.

The Prime Minister accepted the Committee's recommendation that the application be approved, subject to the conditions that:

- Mr Anderson should not draw on privileged information available to him as a Crown servant; and
- For two years from his last day in Crown service, Mr Anderson should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The [letter](#) containing the final advice was sent in March 2015 and he took up the role later that month.

## **Leighton Andrews**

### **Minister for Education and Skills, Welsh Government**

Leighton Andrews left his role as Minister for Education and Skills, Welsh Government, in June 2013.

#### **1. Honorary Professor, Cardiff University**

Mr Andrews sought permission to take up an unpaid, part-time position as an Honorary Professor at Cardiff University. This is a renewal of a current honorary position that began in 2004, for five years, has already been renewed, and now is to be renewed once again.

When considering this application the Committee noted that Mr Andrews had official dealings with all universities in Wales whilst in office and that he was concerned with

Higher Education policy development. The Committee took into account the fact that Mr Andrews was involved in extensive public policy research and management of the programme on Masters in Educational Practice (for new teachers).

The Committee advised Mr Andrews that it saw no reason why he should not take up the appointment, subject to the conditions that:

- he should not draw on any privileged information available to him as a Minister and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the Welsh Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Andrews in July 2014 and he took up the appointment later that month.

## **Sir Dominic Asquith**

### **HM Ambassador to Libya, Foreign and Commonwealth Office**

Sir Dominic Asquith left his role as HM Ambassador to Libya in March 2013.

#### **1. Commission with Libya Holdings Group**

In November 2013 Sir Dominic received approval to become an [independent consultant](#), providing political and commercial advice to businesses operating in, or seeking to enter, the Middle East.

In 2014 he sought advice on taking up a commission with the Libya Holdings Group, providing advice on Middle East operations. The Committee agreed that this commission was acceptable within the terms of his independent consultancy, and subject to the conditions imposed on that consultancy.

The [letter](#) confirming this was sent in July 2014 and Sir Dominic took up the appointment in December 2014.

## **Nick Baird**

### **Chief Executive, UKTI**

Nick Baird left his role as Chief Executive of UKTI in December 2013.

#### **1. Non Executive Director, Nord Anglia Education (Hong Kong)**

Mr Baird sought advice to accept a part-time, paid appointment as a Non Executive Director for Nord Anglia Education.

In their consideration of this application, the Committee noted that Mr Baird did not have any direct contractual dealings with his prospective employer, or its parent companies, over his last two years of service.

The Committee recommended that Mr Baird's application be approved subject to the following conditions;

- Mr Baird should not draw on privileged information available to him from his time in Government; and
- For two years from his last day in service, Mr Baird should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The [letter](#) containing the final advice was sent in March 2015, and he took up the appointment in May 2015.

## **Rt Hon Gregory Barker**

### **Minister of State, Department of Energy & Climate Change, and Minister for Business Engagement with India**

The Rt Hon Gregory Barker left his role as Minister of State in DECC and Minister for Business Engagement with India in July 2014.

#### **1. Independent consultant, and commission with Ras Al Khaimah Development LLC**

Mr Barker asked for the Committee's advice about setting up an independent consultancy and accepting a commission under that consultancy with Ras Al Khaimah Development LLC, having left Government in July 2014.

When considering this application the Committee took into consideration the fact that the independent consultancy will provide strategic advice to international clients on geo-political issues, investor relations, corporate strategy, financial public relations and international public policy.

The Committee noted that Mr Barker stated that during his last two years in office he did not have any official dealings with his prospective client and he was not aware of any relationship, either contractual or non-contractual between the client and his former departments. Mr Barker stated that during his last two years in office he did not have any official dealings with competitors of the client.

Mr Barker further stated that none of the advice he would be providing to Ras Al Khaimah relates to the UK and that, going forward, the intention is to continue focusing on international projects. He has no intention to offer or undertake any lobbying of HM Government either now or in the future, or to seek any work from any company with whom he may have had a commercial relationship as a Minister.

The Committee advised Mr Barker that it saw no reason why he should not take up the appointment subject to the following conditions:

- he should not draw on privileged information available to him from his time in Government;
- for two years from his last day in ministerial office, he should not become personally involved in lobbying UK Government on behalf of his new employer or its clients;
- given his ministerial brief as Minister for Business Engagement with India, in relation to commissions involving India, there is a waiting period of 6 months from his last day in ministerial office and
- once he has received approval to set up as an independent consultant, he must seek confirmation from the Committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application.

The Committee wrote its [advice letter](#) to Mr Barker in November 2014 and he took up the commission later that month.

## **2. Non Executive Director, Ilios Group**

Mr Barker asked for the Committee's advice about taking up a part-time paid appointment (1 day per week) with Ilios Group having left Government in July 2014.

When considering this application the Committee took into account that Mr Barker will join the board as a non executive director to help with strategy, growth and governance of this major new solar company in Mexico, launched to drive forward distributed clean energy following the reform of their electricity sector.

The Committee noted that during his last two years in office Mr Barker stated that he did not have any official dealings with his prospective employer. As a Minister, he visited Mexico once, for the December 2010 Cancun Climate Change Conference. He stated that he was not aware of any relationship, either contractual or non contractual, between Ilios Group and his former departments and that during his last two years in office he did not have any official dealings with competitors of his prospective employer.

The Committee advised Mr Barker that it saw no reason why he should not take up the appointment subject to the following conditions:

- he should not draw on privileged information available to him from his time in Government (including in his capacity as the Prime Minister's Envoy on Climate Change) and
- for two years from his last day in Ministerial office, he should not become personally involved in lobbying UK Government on behalf of his new employer its parent companies or its clients.

The Committee wrote its [advice letter](#) to Mr Barker in March 2015 and he took up the new role in April 2015.

## **3. Non Executive Director, Dragon Harvest Group**

When considering this application, the Committee took into account the fact that Dragon Harvest Group is an investment platform for Asian capital seeking European opportunities for institutional and corporate investors. This is a new company, recently formed, and currently being registered in Hong Kong. Mr Barker will join as a main board non-executive Director, helping inform and monitor the overall group investment strategy and performance with a focus on investment in European infrastructure on behalf of Chinese investors.

The Committee noted that Mr Barker stated that during his last 2 years in office he did not have any official dealings with his prospective employer or its parent company and nor is he aware of any relationship, either contractual or non-contractual between his prospective employer and his former department. He stated that during his last 2 years of office he did not have any official dealings with competitors of his prospective employer or its parent company.

The Committee advised Mr Barker that it saw no reason why he should not take up the appointment subject to the following conditions:

- Mr Barker should not draw on privileged information available to him from his time in Government (including in his capacity as the Prime Minister's Envoy on Climate Change) and
- for two years from his last day in Ministerial office, he should not become personally involved in lobbying UK Government on behalf of his new employers its parent companies or its clients.

The Committee understood that it was Mr Barker's intention to stand down from his role as the Prime Minister's Envoy on Climate Change and that he would not take up the appointment with Dragon Harvest Group until he stood down.

The Committee wrote its [advice letter](#) to Mr Barker in February 2015 and he took up the role in April 2015.

#### **4. Non Executive Director, Lightsource Renewable Energy Ltd**

When considering this application, the Committee took into account the fact that Mr Barker wishes to take up a part-time paid appointment with Lightsource Renewable Energy Ltd; an organisation that sells solar panel technology to customers around the UK. He will join the Board of the organisation as a NED and your role will involve advising on commercial strategy in the UK and developing new opportunities in Africa.

The Committee noted that Mr Barker had official dealings with Lightsource during his last two years in office. This was in the form of meetings with the organisation, and other companies and members of the Solar Trade Association, to hear about their views on reforms and the market for renewable energy. He further stated that he had official dealings with competitors of his prospective employer in the solar sector, via attendance at conferences, roundtables and engagement with their trade bodies. He confirmed that he was not involved in the provision of grants or any specific regulatory work with Lightsource while in office and he did not have access to commercially sensitive information about competitors of Lightsource (or its parent company).

The Committee advised Mr Barker that it saw no reason why he should not take up the appointments subject to the following conditions:

- Mr Barker should not draw on privileged information available to him from his time in Government (including in his capacity as the Prime Minister’s Envoy on Climate Change) and
- for two years from his last day in Ministerial office, he should not become personally involved in lobbying UK Government on behalf of his new employers its parent companies or its clients.

The Committee understood that it was Mr Barker’s intention to stand down from his role as the Prime Minister’s Envoy on Climate Change and that he would not take up the appointments with Lightsource Renewable Energy Ltd until he stood down.

The Committee wrote its [advice letter](#) to Mr Barker in February 2015 and he took up the role later that month.

## Jeremy Browne

### Minister of State, Home Office

Jeremy Browne left his role as Minister of State in the Home Office in October 2013

#### **1. Independent consultancy and Honorary Professor with the University of Nottingham**

Mr Browne sought advice to set up as an Independent Consultant, to advise businesses and other organisations on internationalisation, and accept a commission with the University of Nottingham.

In their consideration of this application, the Committee noted that Mr Browne did not have direct official dealings with the University of Nottingham during his last two years in office.

The Committee advised Mr Browne that it saw no reason why he should not take up this role, subject to the following conditions:

- he should not draw on any privileged information available to him as a Minister;
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his clients or those he advises, whether as an independent consultant or otherwise; and
- once he has received approval to set up as an independent consultant, for two years from his last day in ministerial office he must seek confirmation from the Committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application.

The Committee wrote its [advice letter](#) to Mr Browne in April 2015 and he took up his initial commission with the University of Nottingham in June 2015.

# **Rt Hon Alistair Burt**

## **Parliamentary Under-Secretary of State, Foreign and Commonwealth Office**

The Rt Hon Alistair Burt left his role as Parliamentary Under-Secretary of State, Foreign and Commonwealth Office, in October 2013.

### **1. Non Executive Director, President Energy**

Mr Burt sought permission to take up a position as a Non Executive Director for President Energy Plc, an independent, international oil and gas exploration and production company focused on South America.

The Committee advised him that it saw no reason why he should not take up the position, subject to the following conditions:

- He should not draw on any privileged information available to him from his time in Government; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of President Energy or its clients.

The Committee wrote its [advice letter](#) to Mr Burt in January 2015 and he took up the appointment in February 2015.

### **2. Commissions with Global Partners Governance Practice Ltd and Global GSA Group**

In January 2014, Mr Burt received permission from the Committee to set up as an [independent consultant](#), to provide advice orally and in writing to assist with the overall appreciation and understanding of the economic and political environments in various countries. He then asked about accepting commissions with Global Partners Governance Practice Ltd (GPG) and Global GSA Group.

The Committee noted that Mr Burt had had no official contact with the Global GSA Group and, while he had been aware of GPG's work with the FCO's Arab Partnership whilst he was still in crown service and had met those involved in delivering programmes for the UK Government, he had made no executive decision on the awarding of any contract or grant.

The Committee agreed that the two commissions were permissible within the terms of his independent consultancy, which are:

- that he should not draw on any privileged information available to him as a Minister;
- for 12 months from his last day in ministerial office he should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of any bid or contract relating to the work of his former department;

- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of his new company or its clients; and
- once he received approval to set up as an independent consultant, for two years from his last day in ministerial office he must seek confirmation from the committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application.

The Committee wrote its [advice letter](#) to Mr Burt in June 2014 and he took up the appointments that month.

## Julia Church

### Special Adviser, HM Treasury

Julia Church (née Goldsworthy) left her role as a Special Adviser in HM Treasury in March 2014.

#### 1. Independent Consultancy and commission with Hanover

Ms Church sought the Committee's advice to set up as an independent consultant.

The Committee noted that Mrs Church's consultancy services would focus on offering strategic advice, policy research and analysis of UK public policy. This will include providing advice on the priorities of political parties, the broader policy environment and on how clients may wish to contribute to wider political and policy-making processes. The Committee also considered her application to take up a commission with Hanover.

The Committee advised the Permanent Secretary, that the application and the commission with Hanover be approved subject to the conditions that:

- Mrs Church should not draw on privileged information available to her as a Special Adviser;
- for two years from her last day of service, Mrs Church should not become personally involved in lobbying UK Government on behalf of her new employer or its clients;
- for six months from her last day as a Special Adviser she should submit a fresh application for any commission she wishes to accept with individuals, companies or organisations in policy areas within her remit as Special Adviser to the Chief Secretary to the Treasury and
- once she has received approval to set up as an independent consultant, she must seek confirmation from the Committee directly that each individual commission is permissible under the terms of her consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy she will be expected to submit a fresh application.



The [letter](#) containing the final decision was sent in May 2014 and she took up the role later that month.

Lord Dholakia recused himself from the decision as he had a long-standing association with the applicant.

## **2. Commission with PwC**

Ms Church sought the Committee's advice about accepting a commission with PwC, under the terms of her previously agreed independent consultancy.

The Committee noted that Mrs Church had met with PwC representative on two occasions while in office - once as a general catch up, containing an update on their work developing higher level apprenticeships, and once to discuss a policy idea that was in the early stages of development. However, at no point did she have discussions with PwC about project funding, tax or any contractual matters relating to PwC and government.

The Committee agreed that this commission fell within the terms of her independent consultancy. The [letter](#) containing the final decision was sent in July 2014 and the appointment was taken up later that month.

# **Lieutenant General Sir Gary Coward Commander (Land), Defence Equipment and Support, Ministry of Defence**

Lieutenant General Sir Gary Coward left his role as Commander (Land), Defence Equipment and Support, Ministry of Defence in October 2012.

## **1. Consultant, SM&A**

Sir Gary sought the committee's advice to take to accept a role with SM&A as an adviser to Project MARSHALL (formerly JMATTTS).

The Committee noted that MOD has no relationship with SM&A and the appointment will not include any dealings with Sir Gary's former department. The Committee also took into account that Sir Gary has had no official or contractual dealings with his prospective employer or their competitors and he has not been responsible for anyone who has had such dealings.

The Secretary of State for Defence has accepted the Committee's recommendation that the application be approved subject to the following condition:

- that for two years from his last day of service, Sir Gary should not become personally involved in lobbying the UK Government on behalf of his new employer, its partners or its clients.

The [letter](#) containing the final decision was sent in July 2014 and the appointment was taken up later that month.

# **Air Chief Marshall Sir Stephen Dalton**

## **Chief of the Air Staff, Ministry of Defence**

Air Chief Marshall Sir Stephen Dalton left his role as Chief of the Air Staff in January 2014.

### **1. Independent consultancy**

Sir Stephen sought advice to set up as an Independent Consultant to provide broad strategic advice to commercial organisations on a part-time basis, and accept commissions with PA Consulting and Textron.

In their consideration of this application, the Committee noted that Sir Stephen did not have any official dealings with his prospective employers and had not been involved in any decisions affecting them.

The Committee recommended that Sir Stephen's application be approved subject to the following conditions;

- Sir Stephen should not draw on privileged information available to him from his time in Government; and
- For two years from his last day in service, Sir Stephen should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The [letter](#) containing the final advice was sent in November 2014 and he took up the new role in January 2015.

# **Oliver Dowden**

## **Special Adviser to the Prime Minister**

Oliver Dowden left his role as special adviser to the Prime Minister in October 2014.

### **1. Consultant, Policy Exchange**

Mr Dowden sought permission to accept a role as a consultant for Policy Exchange, a centre-right think tank, advising them on a project to educate the public - especially young people - about the role free markets play in a free society.

The Committee noted that Mr Dowden occasionally attended Policy Exchange seminars and lunches whilst a special adviser but had never been an official speaker or sponsor of their reports. He did not have any contractual dealings with them during his last two years of service, nor any significant ones prior to that, and was not responsible for anyone who did have such dealings with them.

The Permanent Secretary accepted the Committee's advice that the application be approved, subject to the conditions that:

- Mr Dowden should not draw on privileged information available to him as a Crown servant; and
- for two years from his last day of service, Mr Dowden should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.

The [letter](#) containing the final decision was sent in December 2014 and he took up the role later that month.

## **Bernard Galton**

### **Director General, Welsh Government**

Bernard Galton left his role as Director General in the Welsh Government in August 2014.

#### **1. Strategic Consultant, Green Park Ltd**

Mr Galton asked for the Committee's advice about taking up a part-time, paid appointment with Green Park Limited, having left Crown service in August 2014.

The Committee noted that Mr Galton stated that the appointment is not likely to include any contact or dealings with the Welsh Government. However, Mr Galton has had direct contractual dealings with Green Park. An executive search contract for the Welsh Government was awarded to Green Park in June 2013 at a value of £1.25m. The HR Director was immediately responsible for letting the contract, but Mr Galton sat on the decision-making panel through the competitive tender exercise. The tender process and awarding of the contract to Green Park was handled by the HR Senior Civil Service Team. Whilst they were in Mr Galton's line management chain they did not report directly to him but to the HR Director.

The Committee noted that Mr Galton did not have access to sensitive information relating to competitors of Green Park except that which would have been provided to him as a member of the tender panel for the awarding of the contract. This would have been information relating to the specific questions that were asked of all those tendering for the contract rather than of a more general commercially valuable or sensitive nature. He will have had access to information about others who had contracts to provide services to Welsh Government in other disciplines (such as ICT). These would not have been competitors of Green Park. He would not have been involved in any policy development or decisions which would have affected Green Park or its competitors.

Other than this, Mr Galton stated that he has not had any official contact with Green Park. He further states that he would not be working on any assignment within Wales.

The First Minister accepted the Committee's recommendation that the application be approved subject to the conditions that:

- there is a waiting period of 6 months from his last day of Crown service;
- Mr Galton should not draw on privileged information available to him as a Crown servant and

- for two years from his last day of service, Mr Galton should not become personally involved in lobbying the Welsh Government on behalf of his new employer or its clients.

The [letter](#) containing the final advice was sent in January 2015 and he took up the appointment in May 2015.

## **2. Strategic Adviser, Sapient Consulting**

Mr Galton asked for the Committee's advice about taking up a part-time, paid appointment with Sapient Consulting, having left Crown service in August 2014.

The Committee considered that fact that appointment is not likely to include any contact or dealings with the Welsh Government. Mr Galton has not had any contractual or official dealings with Sapient.

The Committee took into account that Mr Galton has not had access to any commercially sensitive information about any competitors of Sapient. He has not been involved in the development or administration of any Welsh Government policy which affects Sapient or its competitors or the award of grants affecting Sapient or its competitors.

The First Minister accepted the Committee's recommendation that the application be approved subject to the conditions that

- Mr Galton should not draw on privileged information available to him as a Crown servant and
- for two years from his last day of service, Mr Galton should not become personally involved in lobbying the Welsh Government on behalf of his new employer or its clients.

The [letter](#) the final advice was sent in September 2014 and he took up the role later that month.

# **Rt Hon Cheryl Gillan**

## **Secretary of State for Wales**

The Rt Hon Cheryl Gillan left her role as Secretary of State for Wales in September 2012.

### **1. Member of the Advisory Board, GovNet Communications**

Ms Gillan sought permission to take up a paid, part-time position as a member of the Advisory Board for GovNet Communications, having left Government in September 2012.

When considering the application, the Committee took into account the fact that Mrs Gillan did not have any contact with GovNet while in office. The Committee further noted that the role would not include any lobbying of the Government and that Mrs Gillan left ministerial office over a year ago.

The Committee advised Mrs Gillan that it saw no reason why she should not take up the appointment, subject to the conditions that:

- she should not draw on any privileged information available to her as a Minister and
- for two years from her last day in ministerial office, she should not become personally involved in lobbying the UK Government on behalf of her new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mrs Gillan in May 2014 and she took up the role that month.

## **Stephen Gooding**

### **Director General, Department for Transport**

Stephen Gooding will be leaving his role as a Director General in the Department for Transport in late April/early May 2015.

#### **1. Director, RAC Foundation**

Mr Gooding sought advice on accepting a role as Director of the RAC Foundation, an independent charity that publishes research designed to promote informed debate and advocate policy in the interest of the responsible motorist.

When considering this application the Committee noted that Mr Gooding has had prior dealings with the RAC Foundation, as they are an organisation DfT routinely consults about research and who are used as a sounding board, in the same way as academics researching transport issues. As such, his new role would be likely to involve contact with DfT along these lines.

However, the Committee also noted that there is no financial relationship between the Foundation and DfT; DfT has never commissioned work from them and the Foundation has an endowment that supplies its funding.

The Prime Minister accepted the Committee's recommendation that the application be approved, subject to the conditions that:

- Mr Gooding should not draw on privileged information available to him as a Crown servant; and
- for two years from his last day in Crown service, Mr Gooding should not become personally involved in lobbying the UK Government on behalf of his new employer on its clients.

However, having due regard for the lobbying ban does not prevent communications with Government on matters that are an integral part of the normal course of business of the RAC Foundation.

The [letter](#) containing the final decision was sent in February 2015 and the appointment was announced in March 2015.

# **Lord Green of Hurstpierpoint**

## **Minister of State for Trade and Investment, UKTI**

Lord Green left his role as Minister of State for Trade and Investment in December 2013.

### **1. Chairman of the International Advisory Council, British Chambers of Commerce**

Lord Green sought advice to accept a part-time, unpaid appointment as Chairman of the International Advisory Council, British Chambers of Commerce (BCC).

In their consideration of this application, the Committee noted that Lord Green did not have direct official dealings with the BCC during his last two years in office.

It was also noted that the departments related his former post as Minister of State for Trade and Investment for UKTI were content with the appointment and stated there are no propriety concerns from their perspective.

The Committee recommended that Lord Green's application be approved subject to the following conditions;

- Lord Green should not draw on privileged information available to him from his time in Government; and
- For two years from his last day in service, Lord Green should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) in September 2014 and he took up the new role in October 2014.

# **Stephen Hammond**

## **Parliamentary Under-Secretary of State, Department for Transport**

Stephen Hammond left his role as Parliamentary Under-Secretary of State for Transport in July 2013.

### **1. Adviser, Inmarsat**

Mr Hammond sought advice to accept a part-time, paid appointment as an Adviser for Inmarsat.

In their consideration of this application, the Committee noted that Mr Hammond did not have official dealings with Inmarsat during his last two years in ministerial office. The Committee noted that Mr Hammond's former department did have a relationship with Inmarsat, but that this was of a non-contractual nature.

The Committee advised Mr Hammond that it saw no reason why he should not take up the appointment, subject to the following conditions:

- Mr Hammond should not draw on privileged information available to him from his time in Government; and
- For two years from his last day in service, Mr Hammond should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Hammond in December 2014 and he took up the role later that month.

## **Rt Hon David Heath**

### **Minister of State for Agriculture and Food, Department for Environment, Food & Rural Affairs**

The Rt Hon David Heath left his role as Minister of State for Agriculture and Food, Defra, in October 2013.

#### **1. Chair, Consumer Council for Water, Western Region**

Mr Heath asked for the Committee's advice about taking up a part-time, paid appointment with the Consumer Council for Water (CCW), Western Region, having left Government in October 2013.

The Committee considered that fact that, although the post is appointed by Defra, Mr Heath stated that he had no Ministerial responsibility for the water industry or related aspects of government policy and no dealings with CCW or its constituent regional structures.

The Committee advised Mr Heath that it saw no reason why he should not take up the appointment, subject to the conditions that:

- he should not draw on privileged information available to him from his time in Government and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying UK Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Heath in March 2015 and his new role was announced later that month.

#### **2. Lay Board Member, Solicitors Regulation Authority**

Mr Heath sought the Committee's advice on a role as a lay (and non-executive) board member for the Solicitors Regulation Authority. When considering this application the Committee noted that Mr Heath would not be engaged in lobbying government, but it was possible that discussions may take place from time to time between the SRA board and the Ministry of Justice on regulatory and other matters relating to legal services.

The Committee advised Mr Heath that it saw no reason why he should not take up the appointment, subject to the conditions that:

- he should not draw on privileged information available to him from his time in Government;
- for two years from his last day in ministerial office, Mr Heath should not become personally involved in lobbying UK Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Heath in January 2015 and he took up the appointment in February 2015.

Lord German recused himself as he knew the applicant well.

## **Mark Hoban**

### **Minister for Employment, Department for Work and Pensions**

Mark Hoban left his role as Minister for Employment, Department for Work and Pensions, in October 2013.

#### **1. Non Executive Director, London Stock Exchange (LSE)**

Mr Hoban sought permission to accept a role as a non executive director of LSE. The Committee noted that as Financial Secretary Mr Hoban had had responsibility for financial services policy, which included that which affected LSE and its competitors, but that he had not had access to any commercially sensitive information.

The Committee advised Mr Hoban that it saw no reason why he should not take up the appointment, subject to the following conditions:

- He should not draw on any privileged information available to him from his time in Government; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Hoban in January 2015 and the appointment was announced in February 2015.

#### **2. Chair, Flood Re**

Mr Hoban sought permission to accept a role as Chair of Flood Re, a not-for-profit flood reinsurance fund, owned and managed by the insurance industry.

The Committee noted that while Financial Secretary Mr Hoban had had contact with a range of insurers, as part of the development of financial services policy, but that he did not deal with flood insurance policy and did not have any official dealings with any competitors of Flood Re.

The Committee advised Mr Hoban that it saw no reason why he should not take up the appointment, subject to the following conditions:



- He should not draw on any privileged information available to him from his time in Government; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Hoban in January 2015 and the appointment was announced in February 2015.

Baroness Browning recused herself due to an ongoing interest in the impact of Flood Re.

### **3. Senior Adviser, Markit Limited**

Mr Hoban sought permission to accept a role as a Senior Adviser to Markit Limited, a provider of financial services information. The Committee noted that he had spoken at Markit's conference while a Minister, and had met with some of their competitors, but that he had not been involved in any policy decisions to the exclusive benefit of Markit, nor had he had access to any commercially sensitive information about them or their competitors. They also took into account that he had left ministerial office over a year earlier.

The Committee advised Mr Hoban that it saw no reason why he should not take up the appointment subject to the conditions that:

- He should not draw on any privileged information available to him from his time in Government; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Hoban in November 2014 and he took up the appointment in December 2014.

## **Sir Paul Jenkins**

### **Treasury Solicitor**

Sir Paul Jenkins left his role as Treasury Solicitor in February 2014.

#### **1. Palace of Westminster Review; member of the International Expert Governance Advisory Panel for Ernst & Young; and New Zealand Government Legal Service**

Sir Paul sought the Committee's advice about three appointments to: provide a review of the governance arrangements for security in the Palace of Westminster; become a member of an International Expert Governance Advisory Panel for Ernst & Young, advising the Federal Government of Canada; and undertake a joint consultancy project for the New Zealand Government Legal Service/Crown Law and Government Communications Security Bureau (GCSB).

When considering these applications, the Committee noted that none of the appointments were likely to include contact/dealings with Sir Paul's former Department/Government.

The Prime Minister accepted the Committee's recommendation that, the three month waiting period for Permanent Secretaries having already expired, these applications be approved subject to the conditions that:

- Sir Paul should not draw on privileged information available to him whilst in Crown service; and
- for two years from his last day of service, he should not become personally involved in lobbying the UK Government on behalf of his new employers or their clients.

The [letter](#) containing the final advice was sent in July 2014 and the first of the appointments was taken up later that month.

## **Lord Kerslake**

### **Permanent Secretary, Department for Communities and Local Government, and Head of the Civil Service**

Lord Kerslake left his role as Head of the Civil Service in September 2014 and as Permanent Secretary in DCLG in February 2015.

#### **1. Chairman, King's College Hospital Foundation Trust**

Lord Kerslake sought advice on accepting a role as Chairman of King's College Hospital Foundation Trust.

When considering this application the Committee received assurances, from both the Cabinet Secretary and the Permanent Secretary at the Department of Health, that the public interest in ensuring that KCH has continuity in strategic leadership during a period of operational and financial challenge was best served by Lord Kerslake being able to take up the role at the beginning of April. The Committee judged that no questions of propriety or public concern arose from the appointment and that therefore, exceptionally, the standard three month waiting period for former Permanent Secretaries should be reduced to one month.

The Prime Minister accepted the Committee's recommendation that the application be approved, subject to the following conditions:

- a one month waiting period from his last day in Crown service;
- Lord Kerslake should not draw on privileged information available to him from his time in Crown service; and
- for two years from his last day of service, Lord Kerslake should not become personally involved in lobbying the UK Government on behalf of his new employers, their parent companies or their clients.

The [letter](#) containing the final decision was sent in December 2014 and the appointment was announced in March 2015.

## **2. Chairman of the Board, Peabody**

Lord Kerslake sought advice on accepting a role as Chairman of the Board of Peabody, the Housing Association.

When considering this application the Committee noted that DCLG is the department responsible for housing policy, including affordable housing. When reaching their decision the Committee noted that Peabody is limited to operating in London, and that the responsibility for the funding of affordable housing in London has been devolved to the Greater London Authority (rather than DCLG or the HCA). They further noted that the appointment with Peabody is unpaid, and that Lord Kerslake was offered the role having applied for an advertised post.

The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the following conditions:

- A three month waiting period from his last day in Crown service;
- Lord Kerslake should not draw on privileged information available to him from his time in Crown service; and
- for two years from his last day of service, Lord Kerlake should not become personally involved in lobbying the UK Government on behalf of his new employers, their parent companies or their clients.

The [letter](#) containing the final decision was sent in December 2014 and the appointment was announced in January 2015.

# **Chris Last**

## **Head of Civil Service Human Resources**

Chris Last left his role as Head of Civil Service Human Resources in May 2015.

### **1. Group HR Director, Kier Group**

Mr Last was offered a position as the Group HR Director at Kier Group, a construction and property development company. In this role Mr Last will be involved in talent management, resourcing and employee relations.

The Prime Minister has accepted the Committee's recommendation that Mr Last's application be approved subject to the following conditions:

- He should not draw on privileged information available to him from his time in Crown Service.
- For two years from his last day of service, he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its client.

The [letter](#) containing the final advice was sent in March 2015 and he took up the new role in June 2015.

## **Sir Iain Lobban**

### **Director, GCHQ**

Sir Iain Lobban left his role as Director of GCHQ in January 2015.

#### **1. Advisor, Standard Chartered Bank**

Sir Iain sought advice on accepting a role as an advisor on the financial crimes compliance board committee at Standard Chartered Bank, advising board and committee members on compliance, as part of a newly formed board committee.

The Committee took into account that Sir Iain had no dealings with Standard Chartered bank while in post, did not have access to any commercially sensitive information about them, was not involved in the development or administration of any policy that could affect them, and was not involved in regulatory work or the award of grants that could affect them.

The Prime Minister accepted the Committee's recommendation that the application be approved, subject to the following conditions:

- a three month waiting period from his last day in Crown service;
- Sir Iain should not draw on privileged information available to him as a Crown servant; and
- for two years from his last day in Crown service, Sir Iain should not become personally involved in lobbying the UK Government on behalf of his new employers, their parent companies or their clients.

The [letter](#) containing the final decision was sent in March 2015 and the appointment was announced in April 2015.

#### **2. Independent Advisory Panel Member, Government of Australia**

Sir Iain sought advice on accepting a role as a member of an independent advisory panel to the Government of Australia, providing advice on their cyber policies.

The Committee noted that the only contact he had with the Government of Australia while in post was through government-to-government discussions in the field of national security, including cyber security. They also noted that it was in the UK's national interest to make Sir Iain's expertise available at the earliest opportunity.

The Prime Minister accepted the Committee's recommendation that the application be approved, waiving the waiting period for this appointment, and subject to the following conditions:

- Sir Iain should not draw on privileged information available to him as a Crown servant; and

- for two years from his last day in Crown service, Sir Iain should not become personally involved in lobbying the UK Government on behalf of his new employers, their parent companies or their clients.

The [letter](#) containing the final decision was sent in March 2015 and he took up the role in April 2015.

### **3. Member of the Advisory Council, C5**

Sir Iain sought advice on accepting a role as a Member of the Advisory Council for C5, a private equity firm, providing advice on strategy and innovative technologies.

The Committee took into account that Mr Lobban had no dealings with Standard Chartered bank while in post, did not have access to any commercially sensitive information about them, was not involved in the development or administration of any policy that could affect them, and was not involved in regulatory work or the award of grants that could affect them.

The Prime Minister accepted the Committee's recommendation that the application be approved, subject to the following conditions:

- A three month waiting period from his last day in Crown service;
- Mr Lobban should not draw on privileged information available to him as a Crown servant; and
- for two years from his last day in Crown service, Mr Lobban should not become personally involved in lobbying the UK Government on behalf of his new employers, their parent companies or their clients.

The [letter](#) containing the final advice was sent in March 2015.

## **Sir Peter Luff**

### **Parliamentary Under-Secretary of State, Ministry of Defence**

Sir Peter Luff left his role as Parliamentary Under-Secretary of State, Ministry of Defence, in September 2012.

#### **1. Chairman of the Oversight Board, Royal United Services Institute (RUSI) and the University of Roehampton**

Sir Peter sought advice to accept a part-time, unpaid appointment as Chairman of the Oversight Board for the Royal United Services Institute (RUSI) and the University of Roehampton.

When considering this application, the Committee took into account that Sir Peter did have official dealings with RUSI while in office; he spoke regularly at their events and met members of their staff on an occasional basis. It was also noted that Sir Peter had no

dealings with the University of Roehampton, nor any competitors, during his last two years in office.

The Committee advised Sir Peter that it saw no reason why he should not take up the appointment subject to the following conditions;

- Sir Peter should not draw on any privileged information available to him from his time in Government; and
- he should not become personally involved in lobbying the UK Government on behalf of RUSI and the University of Roehampton, their parent companies or their clients for two years from his last day in office.

The Committee wrote its [advice letter](#) to Sir Peter in July 2014 and he took up the new role later that month.

## **2. Chairman of the Board of Directors, Pub Governing Body**

Sir Peter sought the Committee's permission to accept a part-time, paid, appointment, as Chairman of the Board of Directors for the Pub Governing Body (PGB).

The Committee noted Sir Peter's role as Chairman of the Board of Directors was to provide leadership and direction to the Board, to enable them to fulfil their responsibilities for the overall governance and strategic direction of the organisation, ensuring that the organisation complies with its governing document, company law, relevant legislation and regulations to ensure the PGB pursues its objectives.

The Committee advised Sir Peter that it saw no reason why he should not take up the appointment subject to the condition that:

- for two years from his last day in office, he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.

The Committee wrote its [advice letter](#) to Sir Peter in June 2014 and he took up the new role in July 2014.

# **Vice Admiral Sir Andrew Mathews**

## **Chief of Materiel Fleet, Defence, Equipment and Support, Ministry of Defence**

Vice Admiral Sir Andrew Mathews left his role as Chief of Material Fleet - Defence, Equipment and Support in March 2014.

### **1. Non-Executive Director, National Nuclear Laboratory**

Sir Andrew sought advice to accept a part-time, paid appointment as Non-Executive Director for the National Nuclear Laboratory.

When considering this application, the Committee took into account that Sir Andrew did not have contractual or official dealings with the National Nuclear Laboratory, nor was he responsible for people who did have contractual dealings with them.

The Prime Minister accepted the Committee's recommendation that Sir Andrews's application be approved subject to the following conditions;

- Sir Andrew should not draw on any privileged information available to him from his time in Government; and
- He should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The [letter](#) containing the final decision was sent in July 2014 and he took up the role later that month.

## **Bob Neill**

### **Parliamentary Under-Secretary, Department for Communities and Local Government**

Bob Neill left his role as Parliamentary Under-Secretary, DCLG, in September 2012.

#### **1. Independent Strategic Business Consultant and commissions with HDG Ltd and Kilbride Group**

Mr Neill sought the Committee's advice about taking up a part-time, paid appointment as an independent strategic business consultant. At the same time he sought permission to accept commissions, as an independent consultant, with HDG Ltd and Kilbride Group.

The Committee noted that Mr Neill's role as an independent strategic business consultant was likely to involve areas of work around policy, legal and transactional advice largely relating to infrastructure and real estate.

The Committee advised Mr Neill that it saw no reason why he should not take up the consultancy forthwith, subject to the following conditions:

- that he should not draw on any privileged information available to him as a Minister;
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the Government on behalf of his new employer, its parent company or its clients; and

The Committee wrote its [advice letter](#) to Mr Neill in June 2014 and he took up the role in July 2014.

#### **2. Commission with Cratus Communications**

Mr Neill sought the Committee's advice about accepting a commission with Cratus Communications, a communications firm specialising in local government and planning, as a Non Executive Director on the Board.

The Committee agreed that this commission fell within the terms of Mr Neill's independent consultancy. It wrote its [advice letter](#) to Mr Neill in June 2014 and he took up the role in July 2014.

# **Hannah Nixon**

## **Senior Partner, Ofgem**

Hannah Nixon left her role as Senior Partner, Ofgem, in July 2014.

### **1. Managing Director, Payment Systems Regulator, FCA**

Ms Nixon sought permission to take up a paid, full-time position as Managing Director of the Payment Systems Regulator at the FCA.

When considering this application, the Committee noted that Ofgem might engage, from time to time, with the FCA as a fellow regulator. The Committee also noted that Ms Nixon has also had some contact with the FCA, which she described as very occasional contact with the FCA's Chief Economist to share best practice and foster links between Ofgem and the FCA. She also declared one meeting in 2009 with FSA (as was) staff to inform work at Ofgem. However, the Committee took into account that Ms Nixon's proposed role was advertised and she was the successful candidate.

The Committee took into account that Ms Nixon is likely to have ongoing governmental contact, but not for commercial or lobbying purposes. Ms Nixon has not had access to any information about related policy or commercially sensitive information and has not had contractual dealings with the FCA and was not responsible for anyone who did.

The Prime Minister accepted the Committee's recommendation that the application be approved subject to the conditions that:

- Ms Nixon should not draw on privileged information available to her as a Crown servant;
- for two years from her last day of service, Ms Nixon should not be directly involved in work connected to her previous responsibilities at Ofgem; and
- for two years from her last day of service, Ms Nixon should not become personally involved in lobbying UK Government on behalf of her new employer or its clients.

The [letter](#) containing the final advice was sent in May 2014 and she took up the role in July 2014.

# **Rt Hon Stephen O'Brien**

## **Parliamentary Under-Secretary of State, Department for International Development**

The Rt Hon Stephen O'Brien left his role as Parliamentary Under-Secretary of State, DFID, in September 2012.

### **1. Commission with UK Broadband**



Mr O'Brien sought permission to accept a commission with UK Broadband, as an independent consultant.

The Committee agreed that this commission was acceptable within the terms of his previously agreed independent consultancy, and subject to the same conditions. These conditions were:

- he should not draw on any privileged information available to him from his time in Government including as the Prime Minister's Envoy and Special Representative;
- for two years from his last day in office, he should not become personally involved in lobbying the UK Government on behalf of his new company or its clients; and
- once he has received approval to set up as an independent consultant, for two years from his last day of service he must seek confirmation from the Committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application.

The Committee wrote its [advice letter](#) to Mr O'Brien in April 2014 and he took up the commission that month.

## **Sir John O'Reilly**

### **Director General of Knowledge and Innovation, Department for Business, Innovation and Skills**

Sir John O'Reilly left his role as Director General of Knowledge and Innovation at the Department for Business, Innovation and Skills (BIS) in January 2015.

#### **1. Independent consultancy**

Sir John sought advice on setting up an independent consultancy, advising companies and other organisations in engineering, technology and associated development of human resources.

The Prime Minister accepted the Committee's recommendation that the application be approved subject to the following conditions:

- that he should not draw on privileged information available to him as a Crown servant; and
- for two years from his last day of service, he should not become personally involved in lobbying the UK Government on behalf of his new employer or its client; and
- once he has received approval to set up as an independent consultant, for two years from his last day of service he must seek confirmation from the Committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy, he will be expected to submit a fresh application.

The [letter](#) containing the final decision was sent in February 2015 and he took up the first of his commissions later that month.

## **2. Commissions under independent consultancy**

Since setting up as an independent consultant, Sir John has asked for the Committee's advice on accepting a number of commissions with:

- [Institute of Telecommunications for the Foundation for Science and Technology, Portugal](#)
- [Quality Assurance Framework for Universities with the Ministry of Education, Singapore](#)
- [Agency for Science, Technology and Research, Singapore](#)
- [University at Khalifa University, United Arab Emirates](#)
- [The ERA Foundation Ltd](#)
- [Carnegie-Mellon Portugal Programme](#)
- [Leverhulme Trust](#)

On each occasion the Committee has agreed that the commissions fall under the terms of his independent consultancy and can be accepted, subject to the conditions imposed on the consultancy.

# **Phil Pavitt**

## **Director General of Change, Security and Information, HM Revenue & Customs**

Phil Pavitt left his role as Director General of Change, Security and Information, HM Revenue and Customs in January 2013.

### **1. Chief Information Officer, Specsavers**

Mr Pavitt sought permission to accept a full time, paid appointment with Specsavers as Chief Information Officer - IT.

The Committee noted that Mr Pavitt has not had any contractual dealings and he has not been responsible for people who have had contractual dealings with his prospective employers during his last two years of service.

The Prime Minister has accepted the Committee's recommendation that the application be approved subject to the following conditions:

- that for two years from his last day in Crown service, Mr Pavitt should have no involvement in negotiation or management of any contracts with HMRC; and
- he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.

The [letter](#) containing the final decision was sent in May 2014 and he took up the role in June 2014.

# **Giles Paxman**

## **HM Ambassador to Spain, Foreign and Commonwealth Office**

Giles Paxman left his role as Ambassador to Spain in November 2013

### **1. Non Equity Partner, The Ambassador Partnership**

Mr Paxman sought advice on accepting a role as a Non Equity Partner of the Ambassador Partnership, a corporate diplomacy organisation.

The Committee noted that Mr Paxman had had no official dealings with the Ambassador Partnership, no involvement in policy that could affect them, no involvement in regulatory work that could affect them, and no access to commercially sensitive information about any competitors. They took into account that this position may involve some contact with the FCO or government more generally, but that this would only be through Mr Paxman's possible involvement in providing training in diplomatic skills.

The Foreign Secretary accepted the Committee's advice that the application be approved, subject to the conditions that:

- for two years from his last day of service, Mr Paxman should not become personally involved in lobbying the UK Government on behalf of his new employer or their clients; and
- he should not draw on privileged information available to him as a Crown servant.

Additionally, the FCO has asked that Mr Paxman keep HMA Madrid informed if he solicits or secures any work with the Spanish Government.

The [letter](#) containing the final advice was sent in January 2015.

# **Sir David Reddaway**

## **HM Ambassador to Turkey, Foreign and Commonwealth Office**

Sir David Reddaway left his role as Ambassador to Turkey in February 2014.

### **1. Member of the Council of Experts, Democratic Progress Institute**

Sir David sought advice on an appointment as a member of the Councils of Experts with the Democratic Progress Institute.

In their consideration of this application, the Committee noted that the appointment would involve occasional contact with his former Department. The Committee took into account that Sir David's duties will be to take part in meetings on specific conflict issues and offer advice on how the DPI can help in conflict resolution.

The Committee noted that Sir David did have official contact with the DPI while in post as HM Ambassador to Turkey. It also took into account the fact that the FCO's six month moratorium on former Ambassadors having dealings with their country of last posting had expired. The Committee also noted that the FCO did not believe this appointment could be perceived as a reward and had no reservations about this appointment.

The Foreign Secretary accepted the Committee's recommendation that Mr Sherlock's application be approved subject to the following conditions;

- Sir David should not draw on privileged information available to him from his time in Government; and
- For two years from his last day in service, Sir David should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The [letter](#) containing the final decision was sent in March 2015 and he took up the role later that month.

## **2. Adviser to the Board, Beko**

Sir David sought advice on accepting a part-time, paid appointment as an advisor to the Board of Beko Plc (UK).

The Committee noted that Sir David's proposed role as senior adviser would involve advising the Board on its marketing strategy and business/investment planning in the UK, including its involvement in corporate social responsibility and sponsorship activity, and on any other relevant aspects of British life.

The Committee took into account that Sir David has not had access to commercially sensitive information about any competitors of his prospective employer. Furthermore, he has not been involved in the development or administration of any policy decisions (including the award of grants) that could affect his employer.

The Foreign Secretary has accepted the Committee's recommendation that the application be approved subject to the following conditions;

- for six months from his last day in post, Sir David should not return to Turkey for business purposes, give advice on it or have dealings with companies there;
- for two years from his last day of service, he should not become personally involved in lobbying the UK Government on behalf of his new employer or their clients; and
- he should not draw on privileged information available to him as a Crown Servant.

The [letter](#) containing the final decision was sent in June 2014 and he took up the new role in September 2014.

## **Lord Richards of Herstmonceux Chief of the Defence Staff, Ministry of Defence**

Lord Richards left his role as Chief of Defence Staff in July 2013.

### **1. Arturius International**

Lord Richards sought approval to take up employment with Arturius International, an independent specialist company offering logistics and engineering support in remote and austere locations. The appointment is part-time, one day per month and paid.

In their consideration of this application, the Committee noted that the appointment is not likely to include contact with his former department.

The Prime Minister accepted the Committee's advice that this application be approved subject to the following conditions:

- for two years from his last day of service Lord Richards should not become personally involved in lobbying the UK Government on behalf of his new employer; and
- he should not draw on privileged information available to him as a Crown servant.

The [letter](#) containing the final decision was sent in May 2014 and he took up the role in July 2014.

### **2. Independent consultant**

Lord Richards sought advice on setting up as an independent consultant, to provide geo-strategic advice to foreign governments, companies and organisations.

The Prime Minister accepted the Committee's recommendation that the Independent Consultancy Application be approved subject to the following conditions:

- for two years from his last day of service, Lord Richards should not become personally involved in lobbying the UK Government on behalf of any of his clients;
- he should not draw on privileged information available to him from his time in Crown Service;
- for twelve months from his last day of service he 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 the MoD or UK Armed Forces; and
- for two years from his last day of service, before accepting any new commission he should make a case directly to the Committee to confirm that each individual commission the applicant wishes to undertake 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 he will be expected to submit a fresh application).

The [letter](#) containing the final decision was sent in November 2013, and Lord Richards took up his first role as a consultant later that month.

### **3. Commissions under independent consultancy**

Since setting up as an independent consultant, Lord Richards has asked for the Committee's advice on accepting a number of commissions with:

- [The Brenthurst Foundation](#)
- [Ondra Partners](#)
- [Inter Mediate](#)
- [Huntsworth](#)
- [Apache Asia](#)
- [Asia Pacific Advisory Credit Hybrids and Equity](#)
- [UAE](#)
- [Dyncorps](#)
- [CQS](#)

On each occasion the Committee has agreed that the commissions fall under the terms of his independent consultancy and can be accepted, subject to the conditions imposed on the consultancy.

## **Rt Hon Sir Hugh Robertson** **Minister of State, Foreign and Commonwealth Office**

The Rt Hon Sir Hugh Robertson left his role as Minister of State in the Foreign and Commonwealth Office in July 2014.

### **1. Head of the London Office and Director of International Relations for Falcon and Associates**

Sir Hugh sought advice on accepting an appointment as Head of the London Office and Director of International Relations for Falcon and Associates.

When considering this application the Committee took into account that Sir Hugh had no official contact with Falcon and Associates while in ministerial office and had stated that this role would not involve lobbying the UK Government. The Committee took into account that, unusually, the UK Government overtly supported a bid by Dubai (for Expo 2020) that Falcon and Associates was at the core of. However, this was a decision made by the Foreign Secretary and was before Sir Hugh took up any role in the FCO, so they do not believe that this fact gives rise to any concerns in this case.

The Committee advised Sir Hugh that it saw no reason why he should not accept this appointment subject to the conditions that:

- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of Falcon and Associates or its clients; and
- he should not draw on any privileged information available to him from his time in Government.

The Committee wrote its [advice letter](#) to Sir Hugh in January 2015 and he took up the role in May 2015.

# **Lieutenant General Rollo**

## **Deputy Chief of Defence Staff, Ministry of Defence**

Lieutenant General William Rollo left his role as Deputy Chief of Defence Staff in June 2013.

### **1. Director, The Military Mutual**

Lieutenant General Rollo sought the committee's advice to take up employment with The Military Mutual Ltd, a company offering personal insurance policies to serving military personnel, veterans and reservists, based in London.

The Committee noted that the appointment is likely to include contact with his former department, as in his previous role he had responsibility for injury and life insurance schemes and providers, and The Military Mutual may offer similar cover in the future.

The Prime Minister has accepted the Committee's recommendation that the application be approved subject to the following conditions;

- Lieutenant General Rollo should not draw on privileged information available to him from his time in Crown Service; and
- for two years from his last day of service he should not become personally involved in lobbying the UK Government on behalf of his new employers or its clients.

The [letter](#) containing the final decision was sent in June 2014 and he took up the role in July 2014.

# **Michael Russell**

## **Cabinet Secretary for Education and Lifelong Learning, Scottish Government**

Michael Russell left his role as Cabinet Secretary for Education and Lifelong Learning in the Scottish Government in November 2014.

### **1. Professor of Scottish Culture and Governance in the University of Glasgow**

Mr Russell sought to take up a paid appointment as Professor of Scottish Culture and Governance in the University of Glasgow.

When considering the application the Committee noted that Mr Russell did have official dealings with the University in his last two years in office. As Cabinet Secretary for Education and Lifelong Learning his decisions influenced all higher education institutions in Scotland, although he did not decide individual funding or grants.

The Committee advised Mr Russell that it saw no reason why he should not accept this appointment forthwith subject to the following conditions:

- He should not draw on any privileged information available to him from his time in the Scottish Government; and
- For two years from his last day in office, he should not become personally involved in lobbying Scottish Government Ministers or Crown servants, including Special Advisers, on behalf of his new employer.

The Committee wrote its [advice letter](#) to Mr Russell in March 2015 and he took up the role in May 2015.

Baroness Liddell recused herself from the decision.

## **Rt Hon Alex Salmond**

### **First Minister of Scotland**

Rt Hon Alex Salmond left his role as First Minister of Scotland in November 2014.

#### **1. Columnist**

Mr Salmond sought the Committee's advice on accepting contracts for part time, paid work to contribute regular articles to a number of named national and local newspapers on current affairs, politics and sport.

The Committee advised Mr Salmond that it saw no reason why he should not accept the contracts with the named newspaper organisations, subject to the following conditions:

- he should not draw on any privileged information available to him from his time in Government; and
- for two years from his last day in ministerial office he should not become personally involved in lobbying the Scottish Government on behalf of his new clients.

The Committee also asked Mr Salmond to seek confirmation from the Committee directly that any additional contracts (not already named) were permissible before taking them up. If, after enquiry, the Committee takes the view that a contract is, or may be, substantially different, he would be expected to submit a fresh application.

The Committee wrote its [advice letter](#) to Mr Salmond in January 2015 and he took up the first of the contracts later that month.

## **Sir John Sawers**

### **Chief of the Secret Intelligence Service**

Sir John Sawers left his role as Chief of the Secret Intelligence Service in November 2014.

#### **1. Non Executive Board Member, BP**

Sir John sought advice on accepting an appointment as a Non Executive Member of the Board of BP.



The Foreign Secretary accepted the Committee's advice that this application be approved, subject to the following conditions:

- a three month waiting period from his last day in Crown service;
- Sir John should not draw on privileged information available to him from his time in Crown service; and
- for two years from his last day of service, Sir John should not become personally involved in lobbying the UK Government on behalf of his new employers, their parent companies or their clients.

The [letter](#) containing the final decision was sent in January 2015 and the appointment was announced in May 2015.

## **2. Chairman, Macro Advisory Partners**

Sir John sought advice on accepting an appointment as Chairman of Macro Advisory Partners, an organisation providing investors, corporations and governments with strategic insights.

The Foreign Secretary accepted the Committee's advice that this application be approved, subject to the following conditions:

- a three month waiting period from his last day in Crown service;
- Sir John should not draw on privileged information available to him from his time in Crown service; and
- for two years from his last day of service, Sir John should not become personally involved in lobbying the UK Government on behalf of his new employers, their parent companies or their clients.

The [letter](#) containing the final decision was sent in January 2015 and he took up the role in February 2015.

# **Neil Sherlock**

## **Special Adviser, Deputy Prime Minister's Office**

Neil Sherlock left his role as Special Adviser to the Deputy Prime Minister in March 2013.

### **1. Trustee, Demos**

Mr Sherlock sought advice to accept a part-time, unpaid appointment as a Trustee for Demos.

When considering this application, the Committee took into account that Mr Sherlock did not have official or contractual dealings and has not been responsible for people who have had contractual dealings with his employer during his last two years of service. Furthermore, it took into account that he has not had access to commercially

sensitive information about any competitors or been involved in the development or administration of any departmental policy or decisions (including the award of grants) that could have affected his prospective employer or its competitors.

The Permanent Secretary accepted the Committee's recommendation that Mr Sherlock's application be approved subject to the following conditions:

- Mr Sherlock should not draw on privileged information available to him from his time in Government; and
- For two years from his last day in service, Mr Sherlock should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The [letter](#) containing the final decision was sent in July 2014 and he took up the new role in November 2014.

## **Rt Hon Mark Simmonds**

### **Parliamentary Under-Secretary of State, Foreign and Commonwealth Office**

The Rt Hon Mark Simmonds left his role as Parliamentary Under-Secretary of State, Foreign and Commonwealth Office, in August 2014.

#### **1. Managing Director, Kroll**

Mr Simmonds sought to accept a role as Managing Director of Kroll, a global provider of risk solutions.

The Committee noted that this role would be to provide strategy for cross border business intelligence and asset recovery. They took into account that Mr Simmonds had had no official dealings with Kroll or its competitors while in ministerial office.

The Committee advised Mr Simmonds that it saw no reason why he should not accept this appointment subject to the following conditions:

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

The Committee wrote its [advice letter](#) to Mr Simmonds in April 2015 and he took up the role later that month.

Baroness Liddell recused herself due to a conflict of interest.

#### **2. Chief Operating Officer, Counter Extremism Project**

Mr Simmonds sought to take up a part-time, paid appointment as COO of the Counter Extremism Project (CEP), an international policy organisation set up to counter the extremism narrative.

When considering the application, the Committee noted that Mr Simmonds had had no official dealings with the CEP whilst in ministerial office, and that his former department had no concerns about the appointment. In addition, the nature of the CEP's work meant that it was likely that he would engage in communication with Government. However, having due regard for the lobbying ban would not prevent communications with Government on matters that are an integral part of the normal course of business of the CEP.

The Committee advised Mr Simmonds that it saw no reason why he should not take up the appointment, subject to the conditions that:

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

The Committee wrote its [advice letter](#) to Mr Simmonds in February 2015 and he took up the role in March 2015.

### **3. Chairman of the Advisory Board, Invest Africa**

Mr Simmonds sought advice on accepting a role as Chairman of the Advisory Board of Invest Africa.

The Committee took into account that Mr Simmonds met with Invest Africa once while in ministerial office, in order to understand their work. However, he had no involvement in departmental policy that could affect them, the award of any grants relating to them, and no involvement in regulatory work that would impact on them.

The Committee advised Mr Simmonds that it saw no reason why he should not take up the appointment, subject to the conditions that:

- he should not draw on any privileged information available to him from his time in Government; and
- for two years from his last day in office, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including special advisers, on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Simmonds in November 2014 and he took up the role later that month.

### **4. Strategic Adviser, First**

Mr Simmonds sought the Committee's advice on taking up a position as a Strategic Adviser for FIRST, an international affairs organisation.

When considering this application the Committee took into account that Mr Simmonds had some dealings with FIRST while in ministerial office, but that he was not involved in policy development, the award of grants or any regulatory work that could have affected the organisation. Furthermore, Mr Simmonds had not had official dealings with any competitors of his prospective employer.

The Committee advised Mr Simmonds that it saw no reason why he should not take up the appointment, subject to the conditions that:

- he should not draw on any privileged information available to him from his time in Government; and
- for two years from his last day in office, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including special advisers, on behalf of his new employer or its clients.

The Committee wrote its [advice letter](#) to Mr Simmonds in October 2014 and he took up the role in November 2014.

### **5. Non Executive Deputy Chairman, Commonwealth Enterprise and Investment Council**

Mr Simmonds sought the Committee's advice on taking up a position as Non Executive Deputy Chairman of the Commonwealth Enterprise and Investment Council (CWEIC).

When considering the application, the Committee noted that: the role will involve chairing conferences and promoting trade; Mr Simmonds had no dealings with CWEIC in its current format while in ministerial office; and that he had not been involved in regulatory work, the award of grants, or policy development that could have affected CWEIC.

The Committee advised Mr Simmonds that it saw no reason why he should not take up the appointment, subject to the conditions that:

- he should not draw on any privileged information available to him from his time in Government; and
- for two years from his last day in office, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including special advisers, on behalf of his new employer or its clients.

The Committee wrote its [advice letter](#) to Mr Simmonds in October 2014 and he took up the role later that month.

### **6. CEO, Mortlock Simmonds Ltd**

Mr Simmonds asked for the Committee's advice on accepting an unpaid appointment as CEO of Mortlock Simmonds Ltd, a family investment company set up by Mr Simmonds prior to his entering Parliament. The company's main activity is investment in commercial property.

When considering the application, the Committee noted that: this is an unpaid role, at least for now; it is Mr Simmonds' company, and he acted as its Chairman before

becoming a Minister; and the main activities of the company are unrelated to his former responsibilities as a Minister.

The Committee sees no reason why Mr Simmonds should not accept this appointment subject to the following conditions:

- he should not draw on any privileged information available to him from his time in Government; and
- for two years from his last day in office, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of his new employer.

The Committee wrote its [advice letter](#) to Mr Simmonds in September 2014 and he took up the role in October 2014.

## **Richard Stagg**

### **HM Ambassador to Afghanistan, Foreign and Commonwealth Office**

Sir Richard Stagg left his role as HM Ambassador to Kabul in March 2015.

#### **1. Chairman of the Board, Rothschild (India)**

Sir Richard sought the Committee's permission to accept a part-time, paid role as Chairman of the Board of Rothschild (India) and Senior Advisor to the company.

The Committee took into account that Sir Richard had not had any contractual dealings with Rothschild during his last two years of service, and that he had not had any influence over policy affecting them or their competitors. Although he had met at least once with Rothschild staff during his time as British High Commissioner to India between 2007 and 2011, this had been over three years ago. As part of his appointment, there was a possibility that he would have occasional contact with the High Commission offices in India, but the two-year lobbying ban was sufficient to allay any concerns about the propriety of these contacts. In addition, the FCO had no reservations about the appointment.

The Foreign Secretary accepted the Committee's recommendation that the application be approved subject to the conditions that:

- for two years from his last day of service, Sir Richard should not become personally involved in lobbying the UK Government on behalf of his new employer;
- for six months from his last day in post, he should not return to Afghanistan, the country of his last posting, for business purposes, give advice in matters relating to it, or have dealings with companies there;
- he should not draw on privileged information available to him as a Crown Servant.

The [letter](#) containing the final advice was sent in January 2015, and he took up the role in May 2015.

## **Admiral Sir Mark Stanhope**

### **First Sea Lord, Royal Navy**

Admiral Sir Mark Stanhope left his role as First Sea Lord in September 2013.

#### **1. Royal Naval Trustee, Royal Museums Greenwich**

Sir Mark sought advice on accepting a position as a Royal Naval Trustee for the Royal Museums Greenwich.

The Prime Minister accepted the Committee's advice that this application be approved, subject to the condition that:

- for two years from his last day of service Sir Mark should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The [letter](#) containing the final decision was sent in November 2014 and he took up the role in February 2015.

## **Ian Trenholm**

### **Chief Operating Officer, Department for Environment, Food and Rural Affairs**

Ian Trenholm left his role as Chief Operating Officer of Defra in June 2013.

#### **1. Chief Executive, NHS Blood and Transplant (NHSBT)**

Mr Trenholm sought the Committee's permission to accept a full time, paid appointment as Chief Executive of NHS Blood and Transplant (NHSBT).

The Committee noted that Mr Trenholm's Department had no relationship with NHSBT and that he has not had access to any information about related policy or commercially sensitive information about competitors. The Committee took into account that the post would involve dealings with Government in general, but noted that whilst at Defra Mr Trenholm has had no official contact with NHSBT or any contractual dealings with NHSBT during his last two years of employment, and was not responsible for anyone who did.

The Prime Minister accepted the Committee's recommendation that the application be approved subject to the following conditions;

- Mr Trenholm should not draw on privileged information available to him as a Crown servant; and

- for two years from his last day of service, Mr Trenholm should not become personally involved in lobbying UK Government on behalf of his new employer or its clients except for the purposes of carrying out his role as Chief Executive of NHS Blood and Transplant

The [letter](#) containing the final decision was sent in June 2014 and he took up the new role in July 2014.

## **Peter Unwin**

### **Director General for Policy Delivery Group, Department for Environment, Food and Rural Affairs**

Peter Unwin left his role as Director General for Policy Delivery Group at the Department for Environment, Food and Rural Affairs, in April 2015.

#### **1. CEO, Whitehall and Industry Group**

Mr Unwin sought advice on taking up a role as CEO of the Whitehall and Industry Group, an independent charity whose purpose is to build understanding, co-operation and engagement between Government, business and the not-for-profit sectors.

The Committee noted that the new role would be likely to involve contact or dealings with his former Department as WIG's membership organisations comprises of Government departments and bodies.

The Prime Minister accepted the Committee's advice that this application be approved subject to the following conditions:

- for two years from his last day of service he should not become personally involved in lobbying the UK Government on behalf of his new employer; and
- he should not draw on privileged information available to him as a Crown servant.

The Committee further noted that the lobbying ban would not apply to communications with Government on matters that are an integral part of the normal course of business for the organisation concerned.

The [letter](#) containing the final decision was sent in February 2015 and he will take up the role in April 2015.

## **Baroness Warsi**

### **Senior Minister of State, Foreign and Commonwealth Office, and Minister for Faith and Communities, Department for Communities and Local Government**

Baroness Warsi left her role as Senior Minister of State at the FCO, and Minister for Faith and Communities, DCLG in August 2014.

## **1. Adviser, Shire Bed Company**

Baroness Warsi sought advice on taking up a role as adviser for the Shire Bed Company, a family business she was a shareholder of.

The Committee noted that Baroness Warsi would be returning to a role she held before entering government, and that she had had no official dealings with the company while a minister.

The Committee advised Baroness Warsi that it could see no reason why she should not take up the appointment, subject to the following conditions:

- she should not draw on privileged information available to her from her time in Government; and
- for two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of the Shire Bed Company or its clients.

The Committee wrote its [advice letter](#) to Baroness Warsi in November 2014 and she took up the role in March 2015.

## **Rt Hon David Willetts Minister for Universities and Science, Department for Business, Innovation and Skills**

The Rt Hon David Willetts left his role as Minister for Universities and Science in the Department for Business, Innovation and Skills in July 2014.

### **1. Education Investment Adviser, Silvertown Partnership**

Mr Willetts sought advice on accepting a role as an Education Investment Adviser for the Silvertown Partnership, an organisation specialising in the regeneration of towns.

The Committee noted that Mr Willetts's role would involve identifying and approaching universities that were interested in setting up a site for a major redevelopment plan in the Docklands. His role would be as an advisor on the overall competition and would not involve making decisions on specific universities.

The Committee advised Mr Willetts that it saw no reason why he should not take up the appointment, subject to the conditions that:

- he should not draw on any privileged information available to him as a minister; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Willetts in October 2014 and he took up the role in November 2014.



## **2. Member of Higher Education Strategic Management Board, TES**

Mr Willetts sought advice on accepting a role as member of the Higher Education Strategic Management Board, TES, in order to provide advice on expanding TES's assessments and global rankings of universities and have a presence at meetings abroad where the rankings are discussed. His role would not involve decisions on the rankings of individual universities.

The Committee noted that Mr Willetts had had some contact with TES while in ministerial office, as he had dealt with their journalists. However, he had no involvement in their international activities or corporate strategy.

The Committee advised Mr Willetts that it saw no reason why he should not take up the appointment subject to the conditions that:

- he should not draw on any privileged information available to him as a minister; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Willetts in October 2014 and he took up the role later that month.

## **3. Visiting Professor, King's College London**

Mr Willetts sought advice about accepting a role as a visiting professor at King's College London (KCL), working with academics across the college and the Public Policy Institute.

The Committee noted that KCL receives indirect funding from BIS via the Higher Education Funding Council for England and Research Councils, and that BIS engages with educational institutions on an arms-length basis, but that you did not determine specific institutional allocations.

The Committee saw no reason why he could not take up the appointment, subject to the conditions that:

- he should not draw on any privileged information available to him as a Minister; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

The Committee wrote its [advice letter](#) to Mr Willetts in October 2014 and he took up the role later that month.

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