



# Advisory Committee on Business Appointments

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Fourteenth Annual Report

2012-2013



## **ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

13 December 2013

### **FOURTEENTH ANNUAL REPORT**

This letter accompanies the fourteenth report of the Advisory Committee on Business Appointments, covering the period from 1 April 2012 to 31 March 2013.

The reporting period saw a remarkable increase in the number of applications received, with the Committee considering a total of 172 appointments (compared to 82 in the previous reporting year). This is an increase of 110%, and appears to be attributable to a range of factors.

The Government reshuffle in September 2012 led to a total of 48 appointments of former Ministers during the reporting period (an increase of almost 100% from 2011-12) and will have resulted in a proportionate increase in applications from former special advisers. No applications from former Ministers were considered to be unsuitable.

The Committee also advised on an unusually large number of applications from Crown servants, with 108 applications altogether (for a total of 124 appointments). This volume of applications can be put down to the ongoing reductions in spending across Whitehall and within the armed forces; the effect of the rules which came into effect from 2011 – requiring applications for both paid and unpaid appointments; and what appears to be an increasing tendency for Crown servants to take up new appointments after retiring from full-time public service. As with Ministers, no applications from former Crown servants were considered to be unsuitable.

Despite the increase in its workload, the Committee and its secretariat has been able to improve significantly, and with no loss of thoroughness, the efficiency with which it deals with applications – responding to 87% of applications from both former Ministers and Crown servants within its targets (compared with 77% during the last reporting period). During this reporting year, the Committee continued to meet regularly to discuss our work and to ensure that our approach remained consistent. We will, of course, keep under consideration what more we can do further to improve our procedures and processes.

The Committee continues to work with Government Departments to ensure consistency of approach and procedures across government in the handling of cases at all levels.

The Committee remains mindful of the view of successive Governments that, whilst it is in the public interest that both Ministers and Crown servants should be able to move into posts within the private sector and elsewhere, it is also important that there is no cause for suspicion of impropriety in an appointment. Within

the limited remit given to it, the Committee takes an independent and careful approach when considering individual applications in order to balance this with the rights of individuals to move into employment without obstacle.

This will be the last report published by the Committee before I step down as Chairman in March 2014 at the end of my five-year term. I would like to take this opportunity to highlight, in particular, the steps we have taken in recent years to ensure that our work is as transparent as possible, whilst recognising that we need to protect the confidentiality of the personal information we hold on applicants. In each case we consider, we now publish our advice and its basis in the fullest possible terms – when an appointment has been announced or taken up - on our website and in our Annual Reports; and encourage Government Departments to do the same. This should reduce the risk of any misunderstanding or misrepresentation of individual applications and our advice on them.

Lord Lang of Monkton DL

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## PART 1 – THE COMMITTEE

1. The Advisory Committee on Business Appointments was established by the Prime Minister in 1975. It is an independent, advisory, non-departmental public body.

### MEMBERS

2. The Committee began the reporting year with six members, with two new members joining in May 2012<sup>1</sup>. Three members are nominated by the main political parties and the remaining five are independent members. The independent members, appointed by the Prime Minister, have experience at a high level in the civil service, the diplomatic service, the armed forces and in business. All members are appointed for a single non-renewable term of five years.
3. The two new members – Mark Addison and Mary Jo Jacobi - have been appointed for 5 year non-renewable terms.
4. The Chairman of the Committee is Lord Lang of Monkton, the Conservative Party member.



Ian Lang served as the Conservative MP for Galloway from 1979 to 1983, and for Galloway and Upper Nithsdale from 1983 to 1997. He joined the Cabinet as Secretary of State for Scotland in 1990, a post he held until becoming President of the Board of Trade in 1995. After leaving Government in 1997, he was made a life peer. Since then he has held a number of non-executive business appointments. He is currently Chairman of Marsh & McLennan Companies Inc and a Non-Executive Director of Charlemagne Capital Ltd. He served on the House

of Lords Select Committee on the Constitution from 2002 to 2007 and has served on the Committee once again since 2012.

5. The other members of the Committee are:
  - Mark Addison, independent member
  - Sir Colin Budd, independent member
  - Lord (Navnit) Dholakia, Liberal Democrat member
  - Mary Jo Jacobi, independent member
  - Lord (Gus) Macdonald of Tradeston, Labour member
  - Sir Hugh Stevenson, independent member
  - Lord (Michael) Walker of Aldringham, independent member



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 also currently a Public Appointments Assessor for the Commissioner for Public Appointments and has been the Chair of the Nursing and Midwifery Council since September 2012.

<sup>1</sup> The full complement is eight members.



Colin Budd joined the Diplomatic Service in 1967. During his career he served in Warsaw, Islamabad, The Hague and Bonn, including 2 years as 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 to 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). He is currently a member of the QC Selection Panel and 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, 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.



Gus Macdonald was a broadcaster and businessman before his elevation to the House of Lords and appointment as Minister for Business and Industry at the Scottish Office in 1998. Subsequent posts were Minister for Transport (1999-2001) and Minister for the Cabinet Office and Chancellor of the Duchy of Lancaster (2001-2003). He is an adviser to Macquarie Infrastructure Real Assets and a board member of Scottish Power.



Mary Jo Jacobi has held senior roles in the banking and financial services industry at HSBC (1993-2000), Lehman Brothers (2000-2001) and Drexel Burnham Lambert (1985-1990). She has also

worked in the global oil and gas industry, notably as Vice President, Group External Affairs at Royal Dutch Shell (2001-2005) and as Executive Vice President at BP America following the Gulf of Mexico Oil Spill (2010-2011). She was also a Non-Executive Director of Tate and Lyle plc (1998-2004). Mary Jo was formerly an aide to President Ronald Reagan, joining his administration in 1981 and serving as Special Assistant for Business Liaison (1983-85). She resumed US Government service when President George H W Bush appointed her Assistant US Secretary of Commerce (1992-1993). From 2005-2010 she was a Civil Service Commissioner in Great Britain. Currently, Mary Jo is a consultant on business strategy and communications and is a Non-Executive Director of Mulvaney Capital Management. She has been a Visiting Fellow of the Leeds University Business School since 2004 and of the Oxford University Centre for Corporate Reputation since 2009. She is a Fellow of the RSA and a member of the Royal Institution, the Worshipful Company of International Bankers and the FCO's Wilton Park Advisory Council, and she chairs the Sir Heinz

Koeppler Trust and the Wilton Park USA Foundation.



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 from 1987 to 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, 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.

6. The Committee is supported by a small secretariat at its office at 1 Horse Guards Road, London, SW1A 2HQ.

7. The Business Appointment Rules apply to all Crown servants and Ministers for two years after they leave Crown service. A copy of the Rules for Ministers is at Annex A and a copy of the Rules for Crown servants is at Annex C.

8. The role of the Committee is to:

- provide independent advice to the Prime Minister<sup>2</sup> on the application of the Government's Business Appointment Rules (the Rules) to the most senior members of the civil service, armed forces, diplomatic service, and intelligence agencies who wish to take up appointments within two years of leaving Crown service; and
- provide independent advice directly to former Ministers on appointments they wish to take up within two years of leaving Government.

9. The Committee is limited in the restrictions it can recommend under the Rules by Human Rights legislation and the possibility of action in restraint of trade. Based on legal advice, the Rules confine their restrictions or conditions to a maximum period of two years from an individual's last day of paid service. However, the Committee can, if so minded, recommend that a particular appointment is unsuitable.

10. The Committee's remit is to provide advice. It does not have a role in policing or enforcing its advice. It does, however, publish its advice on all the appointments it considers and that are subsequently taken up or announced. It is through this transparency, as recommended by the Nolan Committee for Standards in

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<sup>2</sup> Advice is provided to the Foreign Secretary if the applicant is from the diplomatic service, to the First Ministers of Scotland and Wales in the case of the Devolved Administrations, or the relevant Permanent Secretary if the applicant is a Special Adviser.

## ROLE OF THE COMMITTEE

Public Life, that applicants and the Committee itself are accountable to the public.

11. Following the Government's review of public bodies in 2010, it was confirmed by the Government that the Committee would be retained due to its role as an independent and politically impartial body.
12. During the reporting period the Committee advised on 124 appointments of Crown servants and on 48 appointments of Ministers.
13. Further details of how the Committee approaches its work are given in Parts 2, 3 and 4 of this report.

## OPENNESS

14. The Committee publishes its final advice on an appointment once the appointment has been taken up or announced.
15. The Committee has a Code of Conduct, which is published. 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.

16. The Committee is required to consider requests submitted to it under the Freedom of Information Act 2000. During the reporting period, 6 requests for information were received and responded to.
17. Since March 2010, the minutes of all Committee meetings have been published on its website: <http://acoba.independent.gov.uk>. The Committee will continue to publish minutes of future meetings once they have been approved by the Committee.

## EXPENDITURE

18. The Committee's expenditure for the financial year April 2012 to March 2013 was £163,478 (compared to £149,927 in 2011-2012). Some of the expenditure on the Secretariat needs to be attributed to the work of the House of Lords Appointments Commission, with whom the Committee shares its support staff.
19. The major element of the expenditure was staff costs, at £121,572. Members' fees of £8,000 for the Chairman and for other Members totalled £17,000. The remainder of the expenditure was for administrative costs.



## PART 2 –MINISTERS

### INTRODUCTION – THE MINISTERIAL CODE

20. The Business Appointment Rules for former Ministers are based on the premise that it is in the public interest that former Ministers with experience in Government should 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 equally important that when a former Minister takes up a particular appointment or employment, there should be no cause for any suspicion of impropriety.
21. The requirement for former Ministers to seek the Committee's advice comes from the Ministerial Code. The Committee also provides advice to former Ministers in Scotland and Wales under their respective Ministerial Codes.
22. The Code states that "on leaving office, Ministers will be prohibited from lobbying Government for two years. They must also seek advice from the independent Advisory Committee on Business Appointments about any appointments or employment they wish to take up within two years of leaving office. Former Ministers must abide by the advice of the Committee."
23. In the reporting period, the Committee advised 20 former Ministers in relation to 48 appointments. In addition, the Committee also advised one Minister in relation to three commissions under the terms of an already agreed independent consultancy.
24. 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 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 85% of cases. This is a significant improvement on the previous financial year, particularly bearing in mind the increase in applications.
25. 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.
26. Former Ministers are asked to complete an application form, which is available on the Committee's website. The Committee asks that it be provided with as full a picture of the proposed employment as possible so that it can provide fully informed advice. The Committee may also seek further confidential evidence from different sources, for example the Minister's former department or the proposed employer or their competitors.
27. 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 Government (the two-year lobbying ban may be waived or reduced by the Committee if it considers this to be justified by the particular circumstances on an individual application). Furthermore, former Cabinet members will have a minimum three month waiting period after leaving office,

### THE PROCESS

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.

28. The advice is published once the former Minister has advised the Committee that he or she has taken up or announced an appointment. The Government's Guidelines for former Ministers state that all applications to the Committee will be "treated in strict confidence and will remain confidential" until the appointment is taken up or publicly announced. Therefore the Committee does

not publish its advice on appointments not taken up.

29. 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. During the reporting period, the Committee did not agree to any appointments that were taken up being withheld from publication.

## PART 3 - CIVIL SERVANTS

### INTRODUCTION – THE BUSINESS APPOINTMENT RULES

30. The key principles of the Rules for civil servants are designed to uphold the core values in the Civil Service Code, of integrity, honesty, objectivity and impartiality.
31. 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).
32. It has been the view of successive Governments that it is in the public interest that people with experience of public administration should be able to move into business or other bodies outside central government, and that 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.
33. 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; and avoid 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.
34. The Rules apply to all Crown servants. The Committee is responsible for providing independent advice to the Prime Minister on

the application of the Business Appointment Rules to the most senior members of the Civil Service and Armed Services who wish to take up appointments within two years of leaving Crown service. Similarly, it provides advice to the Foreign Secretary for senior members of the Diplomatic Service.

35. With regard to applications from civil servants in the Devolved Administrations in Scotland and Wales, the Committee provides advice to the relevant First Minister.
36. Not all applications are referred to the Committee – only those of the most senior civil servants at Director General and Permanent Secretary level. More junior applications are dealt with by departments under their own arrangements. Permanent Secretaries are responsible for the operation of the Rules in their departments.
37. In the reporting period, the Committee advised 72 Crown servants in relation to 124 appointments.
38. In addition, the Committee advised six Crown servants in relation to 37 commissions under the terms of their independent consultancies.

### THE RULES

39. The Committee believes that the new Rules that were introduced in the last reporting period have provided greater clarity and consistency. The Committee will continue to seek assurances from departments on the operation of the Rules as part of its informal compliance monitoring checks (as prescribed by the Rules) and on their operation when the checks have concluded. During this reporting period, the checks involved:

- All departments certifying whether they have complied with the Rules;
- A selection of departments conducting more detailed self assessments; and
- The Secretariat conducted a more detailed assessment of compliance (including visits) of a smaller selection of the departments.

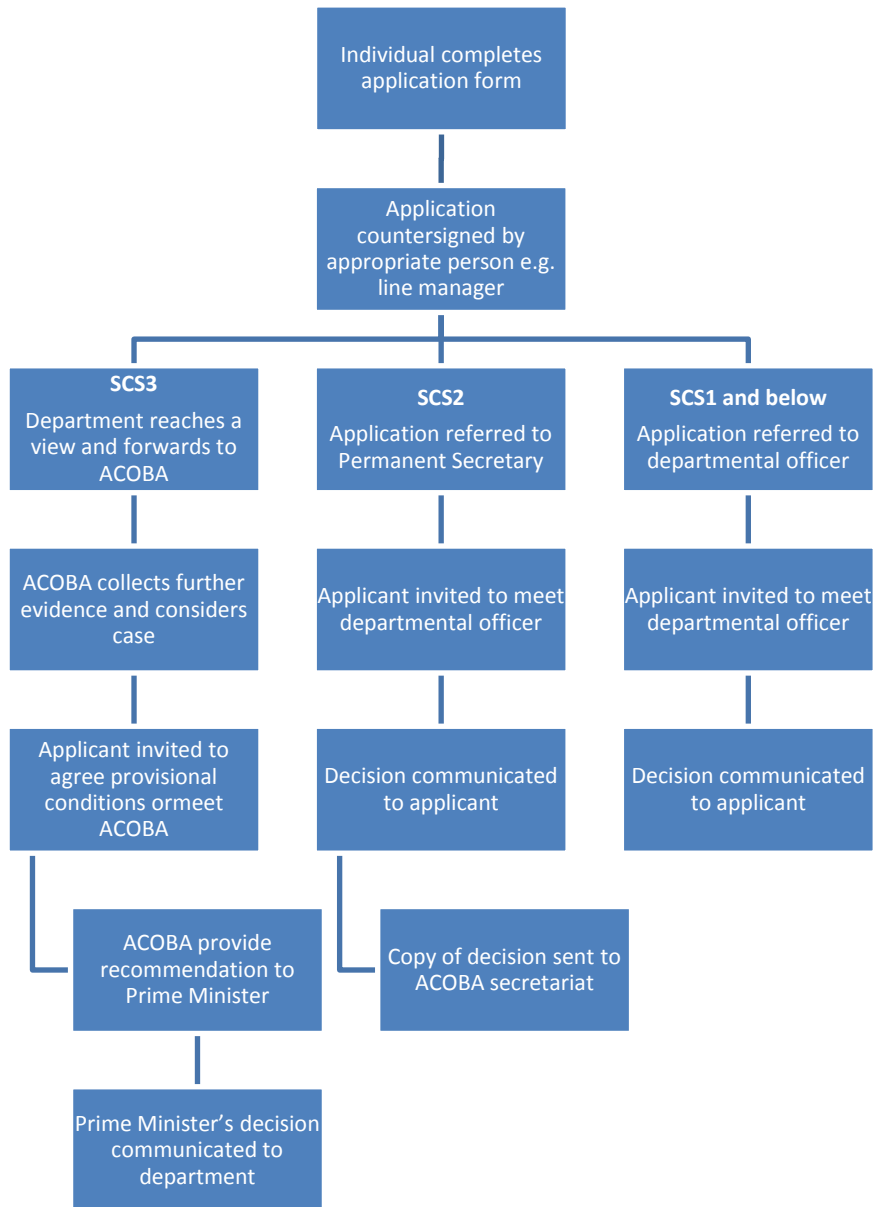
## THE PROCESS

40. For the applications it considers, the Committee aims to provide its advice to the Prime Minister 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, 87% of cases were dealt with within the 20 day target. This is a significant improvement on the previous financial year.
41. 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 departments 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 which could affect either the prospective employer or competitors.
42. 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 the security services, another Government department or the Cabinet Office. In some instances the Committee will meet applicants to discuss the proposed appointment further.

43. 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 of up to two years. However, as for Ministers, the Committee may judge an appointment to be unsuitable and can advise the Prime Minister to this effect.
44. Once the Committee has agreed its advice it writes to the Prime Minister, who then considers the application and the Committee's recommendation. Once he has made his decision the Committee is informed and communicates this to the department.
45. 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.
46. 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.

## THE PROCESS



## PART 4 - THE COMMITTEE'S APPROACH

### RESTRICTIONS

47. The Committee is mindful of the need to balance the public interest in applying the Rules with the rights of individuals to change employment under the restraint of trade laws. This means that any restrictions must be fair and proportionate if they are to be legally enforceable. The maximum sanction the Committee can recommend is a two-year wait before taking up an appointment. The Committee does not have any legal right to prevent any appointment being taken up, nor does it have any policing powers to ensure its advice is followed.
48. In order to be fair and reasonable, each case is judged on its own merits.
49. The Committee's advice ranges from unconditional approval to, in a small number of cases, judging that an appointment is unsuitable. In 2012-13, the Committee did not advise that any appointments were unsuitable. However, past experience has shown that in those rare cases when the Committee indicates to an applicant that it considers an appointment to be unsuitable, the application may be withdrawn. As only appointments which are taken up are published, the Committee's website and reports do not usually show any unsuitable appointments.

### LOBBYING

50. The current Rules define lobbying as "[engaging] in communication with Government (including Ministers, special advisers and officials) with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted."

### SPEAKING ENGAGEMENTS

51. The Committee's approach has been not to ask for applications to be made for ad hoc speaking engagements, but that it should be consulted if individuals intend to enter into a longer term arrangement. It therefore expects those individuals to seek its advice who, for example, wish to join a speakers' agency, or who plan a series of remunerated speeches or wish to write a regular newspaper column.

### RETROSPECTIVE ADVICE

52. The Committee feels strongly that its advice should be sought before an individual takes up an appointment or before it is announced, in line with the Rules for Civil Servants and the Ministerial Code. It is important for public accountability that the Committee is free to offer the most appropriate advice in any situation – which may include an appointment being unsuitable – without it appearing to be constrained by the individual having already signed a contract or taken up a post.
53. It is also in the individual's interest to seek advice and inform the Committee before an appointment has been taken up or announced. Otherwise, the Committee is not able to deal with any enquiries about the appointment, since it does not release information about appointments which have not been taken up or announced, and this can lead to a false assumption being made as to whether an individual has complied with the Rules.
54. As mentioned previously, all former Ministers are written to when they leave office to remind them of the need to seek the Committee's advice before taking up any appointments or employment. Departments

are responsible for ensuring that departing Crown servants are aware of the Rules.

55. The Committee has decided that its concern that an individual has taken up an appointment before receiving advice should be made clear publicly. It is for this reason

that its published advice on a number of retrospective applications includes a comment that the Committee noted with concern that the appointment had been accepted without advice being sought (this was the case with five applications during this reporting period).

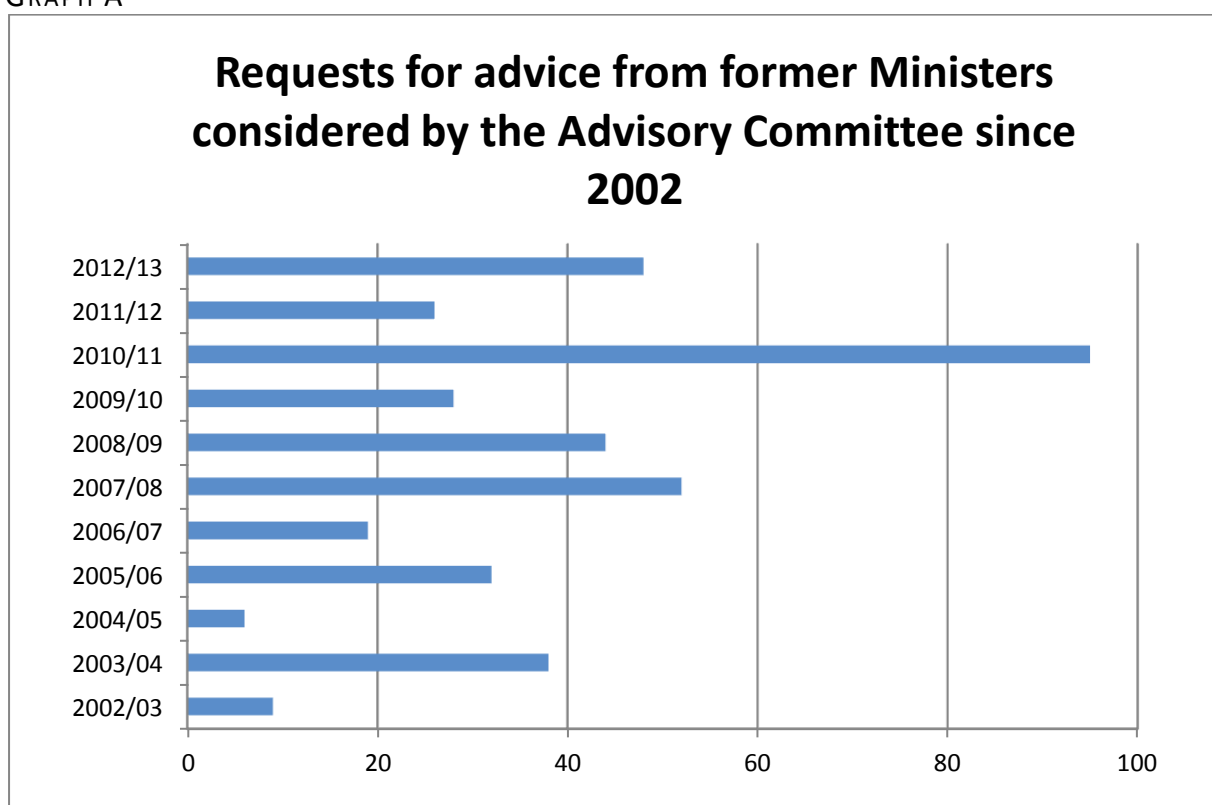
## PART 5 - APPOINTMENTS

### MINISTERS

56. The Committee offered advice to 20 former Ministers on 48 appointments during the reporting period. The details of the appointments that were taken up, together with the Committee's advice, are at Annex B.

57. The number of applications advised upon during this reporting year was much higher than during the last reporting year. Graph A shows the number of applications since 2002.

GRAPH A <sup>3</sup>



<sup>3</sup> The increase in applications in 2010-11 is a result of the General Election in 2010 and a change in the governing party. The majority of applications in 2011-12 were from Crown servants.



58. Table 1 and Graph B show the number of applications from former Ministers that were advised upon during the period, broken down by the conditions advised by the Committee. In the majority of cases the Committee has recommended that Ministers observe a

condition (such as a lobbying ban) and in a number of these it has also advised that a waiting period is appropriate. The Committee did not advise any Ministers that their applications were unsuitable during the reporting period.

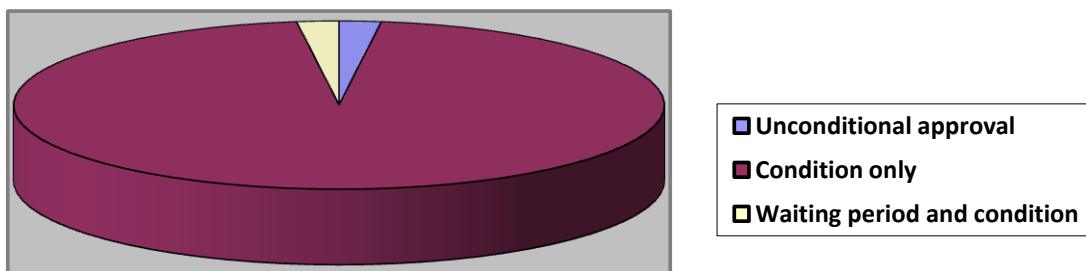
TABLE 1

**Requests from former Ministers considered by the Advisory Committee in 2012 – 13 categorised by outcome**

<b>SUMMARY OF APPLICATIONS</b>		
	<b>Waiting Period Length</b>	<b>Number of Appointments</b>
<i>Appointments approved unconditionally</i>		1
<i>Approved subject to behavioural conditions only</i>		46
<i>Approved with waiting period &amp; behavioural conditions</i>	6 months	1
<b>TOTAL</b>		<b>48</b>

GRAPH B

**Requests from former Ministers considered by the Advisory Committee in 2012-13, categorised by outcome**



## CROWN SERVANTS

59. The Committee offered advice to 74 Crown servants on 124 appointments. The details of the appointments that were taken up, together with the Committee's advice, are at Annex D.

60. Table 2 shows these appointments broken down by department, with an overview of the type of recommendation made by the Committee. This is also shown in Graph C.

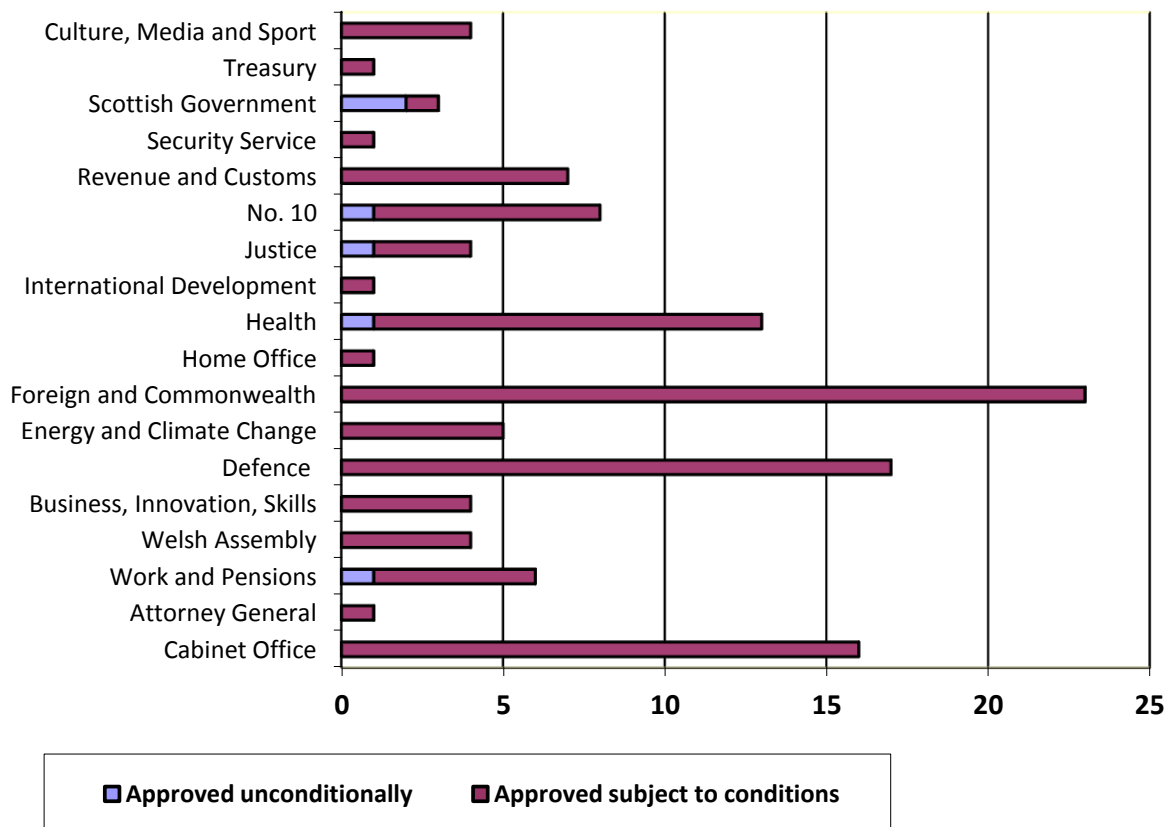
Table 2

**Crown servants' Appointments considered by the Advisory Committee in 2012 -13 categorised by department and outcome**

<b>Department</b>	<b>Applicants</b>	<b>Appointments</b>	<b>Approved Unconditionally</b>	<b>Approved Subject to Conditions</b>
Attorney General	1	1	0	1
Business, Innovation, Skills	4	4	0	4
Cabinet Office	7	16	0	16
Culture, Media and Sport	2	4	0	4
Defence	12	18	0	17
DEFRA	3	3	0	3
Energy and Climate Change	4	5	0	5
Foreign & Commonwealth Office	9	23	0	23
Home Office	1	1	0	1
Health	9	13	1	12
International Development	1	1	0	1
Justice	3	4	1	3
No. 10	4	8	1	7
Revenue and Customs	4	8	0	7
Security Service	1	1	0	1
Scottish Government	3	3	2	1
Treasury	1	1	0	1
Work and Pensions	3	6	1	5
Welsh Assembly	2	6	0	6
<b>TOTAL</b>	<b>74</b>	<b>124</b>	<b>6</b>	<b>118</b>

GRAPH C

**Applications from Crown Servants considered by the Advisory Committee in 2012-13  
categorised by department and outcome**



61. Table 3 and Graph D show the number of appointments from Crown servants that were advised upon during the period, broken down by the conditions advised by the Committee. As for Ministers, in the majority of cases the Committee has recommended a condition (such as a lobbying ban) and in a number of

these it has also advised a waiting period. The Committee did not advise that any applications were unsuitable during the period. However, it has been the case that if the Committee indicates that it is likely to recommend an application is unsuitable, applicants withdraw their application.

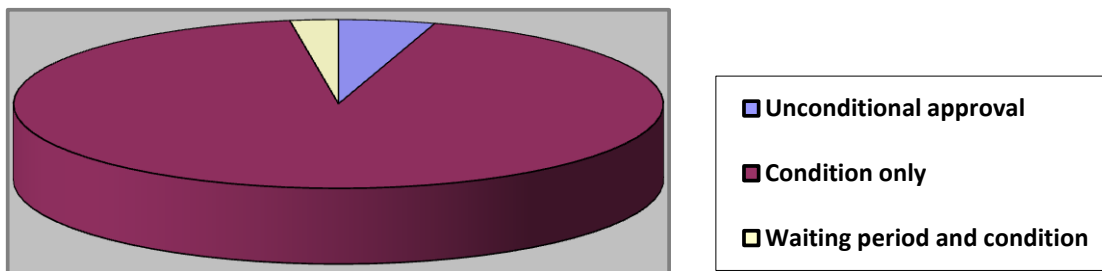
TABLE 3

**Crown servants' appointments considered by the Advisory Committee in 2012- 13  
categorised by outcome**

<b>SUMMARY OF APPLICATIONS</b>		
	<b>Waiting Period Length</b>	<b>Number of Appointments</b>
Applications approved unconditionally		6
Approved subject to behavioural conditions only		115
Approved subject to waiting period only		0
Approved with waiting period & behavioural conditions	3 months	3
<b>TOTAL</b>		<b>124</b>

GRAPH D

**Requests from Crown servants considered by the Advisory Committee in 2012-13,  
categorised by outcome**



## Annex A

# BUSINESS APPOINTMENT RULES FOR FORMER MINISTERS

**It is in the public interest that former Ministers with experience in Government should be able to move into business or into other areas of public life, and to be able to start a new career or resume a former one. It is equally important that when a former Minister takes up a particular appointment or employment, there should be no cause for any suspicion of impropriety.**

## THE RULES

**“On leaving office, Ministers will be prohibited from lobbying Government for two years. They must also seek advice from the independent Advisory Committee on Business Appointments about any appointments or employment they wish to take up within two years of leaving office. Former Ministers must abide by the advice of the Committee.”** *[Ministerial Code, section 7.25]*

1. The business appointment rules for former Ministers seek to counter suspicion that:
  - a. the decisions and statements of a serving Minister might be influenced by the hope or expectation of future employment with a particular firm or organisation; or
  - b. an employer could make improper use of official information to which a former Minister has had access; or
  - c. there may be cause for concern about the appointment in some other particular respect.

## APPLICATIONS BY FORMER MINISTERS

2. The application form, which can be accessed at:

<http://acoba.independent.gov.uk/media/21233/application-former-ministers.rtf>

will in most cases provide the Advisory Committee with the information it requires in order to give its advice. The Committee will need to consider details of the proposed appointment or employment, which includes any proposal to undertake consultancy work. If necessary, the Committee will seek, in confidence, additional information from senior officials of a former Minister's Department(s) about any contact with the prospective employer or its competitors and the nature of any contractual, regulatory or other relationships with them. The Committee will also, if relevant to the proposed appointment or employment, take account of any other role that the former Minister may have been (or still be) carrying out on behalf of the Government. With the former Minister's permission, the Committee may wish to contact the proposed new employer for clarification of the proposed appointment or employment and notification of the conditions that will apply to it.

3. The Advisory Committee will consider each request for advice about an appointment or employment on its merits, against specific tests relating to the following:
  - i. to what extent, if at all, has the former Minister been in a position which could lay him or her open to the suggestion that the appointment was in some way a reward for past favours?

- ii. has the former Minister been in a position where he or she has had access to trade secrets of competitors, knowledge of unannounced Government policy or other sensitive information which could give his or her new employer an unfair or improper advantage?
  - iii. is there another specific reason why acceptance of the appointment or employment could give rise to public concern on propriety grounds directly related to his or her former Ministerial role?
4. The Advisory Committee will need to balance any points arising under these tests against the desirability of former Ministers being able to move into business or other areas of public life, and the need for them to be able to start a new career or resume a former one.

## RESTRICTIONS

5. The Advisory Committee may advise that they see no reason why an appointment or employment should not be taken up forthwith without any condition. However, if it considers that public concern could be of such a degree or character, it may recommend a delay in taking up the appointment, or that for a specified period the former Minister should stand aside from involvement in certain activities, for example, commercial dealings with his or her former Department, or involvement in particular areas of the new employer's business. Any conditions advised may apply for a maximum of two years after the former Minister leaves office. Exceptionally, the Committee may advise that they view a particular appointment or employment to be unsuitable.
6. As a general principle, there will be a two year ban on former Ministers lobbying Government after they leave office. This means that a former Minister should not engage in communication with Government (Ministers, civil servants, including special advisers, and other relevant officials) with a view to influencing a Government decision or policy in relation to their own interests or the interests of the organisation by which they are employed, or to whom they are contracted. The two-year lobbying ban may be reduced by the Advisory Committee if they consider this to be justified by the particular circumstances of an individual application.
7. A minimum waiting period of three months from the date of leaving office to taking up an appointment or employment will be expected when the former Minister was a member of Cabinet, and may also be applied to other former Ministers if the Advisory Committee believes this to be warranted by the circumstances of the individual case. The Committee may waive this minimum waiting period if, in its judgement, no question of propriety or public concern arises from the appointment or employment being taken up earlier. Equally, the Committee may consider that public concern about a particular appointment or employment could be of such a degree or character that a longer waiting period is appropriate up to the maximum period of two years that may be applied.
8. The Advisory Committee aims to provide their advice within 15 working days from receipt of the required information. Complex cases may take longer, but in such cases, the Advisory Committee's Secretariat will notify the former Minister concerned.
9. If, having received the Advisory Committee's advice, a former Minister has concerns, he or she will have an opportunity to make representations to the Committee, including an opportunity to meet with the Committee if they so wish.

## PUBLICISING THE ADVISORY COMMITTEE'S ADVICE<sup>4</sup>

All approaches to the Advisory Committee will be handled in strict confidence, and will remain confidential until the appointment or employment is publicly announced or taken up, at which time the Committee will make public its advice, alongside summary details of the former Minister's last Ministerial post, and the appointment or employment to be taken up. Details will be placed on its website <http://acoba.independent.gov.uk> and in its annual report. If asked, the Committee will say publicly whether or not its advice had been sought about an appointment or employment which had been taken up within two years of a Minister leaving office.

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<sup>2</sup> The Committee handles personal information provided to it in accordance with the Data Protection Act 1998. Such information may on limited occasions be published, for example, if the Committee is required to publish information in accordance with the Freedom of Information Act 2000.

## Annex B

# Advice given on appointments taken up by former Ministers

**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.

<b>Baroness Browning</b> Former Minister of State, Home Office	
Left office	September 2011
<b>Speaker with Cumberlege Connections</b>	
Took up first engagement	November 2012
Baroness Browning sought advice about accepting a role as a speaker on Cumberlege Connections' 'Westminster Experience' course on how Parliament works.  <b>The Committee advised her that, on the understanding that she would not draw on any privileged information from her time in government, it saw no reason why she should not accept the engagements forthwith.</b>	
<b>Date of approval</b> <a href="#">Approval letter</a>	November 2012
<b>Rt Hon Paul Burstow MP</b> Former Minister of State for Care Services, Department of Health	
Left office	September 2012
<b>Trustee, Silverline</b>	
Took up new appointment	December 2012
Mr Burstow sought advice about accepting a part time unpaid role as a Trustee of the charity Silverline. Silverline provides a telephone based support and referral service for older people, with the aim of helping them to maintain and build social connections and resilience. The post will take up one or two days per month. He will be speaking on behalf of the charity about issues of social isolation and loneliness, advising on how local and national government operate and on current and possible policy. He will also provide oversight and ensure good governance to achieve the charity's objectives.  The Committee noted that he had had some official dealings with the organisation before it achieved charitable status and that the Department of Health has agreed to contribute to the funding of the charity during its launch phase. It also noted that the appointment is unpaid and that he had waited three months from the date he left leaving office before seeking to take up the appointment.  <b>The Committee advised him that it saw no reason why he should not take up the appointment forthwith, subject to the condition that;</b>	



**- for two years after leaving office, he should not become personally involved in lobbying Government on behalf of his new employer, and he should stand aside from any bid for funding or contract dealings involving his new employer and the Department of Health.**

**The advice is also given on the basis that he would make clear in any dealings he has with other organisations with which Silverline has or is seeking work involving the health sector, that he is not representing the Department of Health and that he has no special access to the Department.**

<b>Date of approval</b> <a href="#">Approval letter</a>	December 2012
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**Jonathan Djanogly**  
Former Parliamentary Under-Secretary of State, Ministry of Justice

Left office	September 2012
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**Independent consultant (CGLV Ltd)**

Took up new employment	November 2012
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Mr Djanogly sought advice on his proposals to incorporate a consultancy company (CGLV Ltd) for the purposes of entering into a retainer with Oakley Capital Ltd, an FSA registered company that provides corporate finance advice, and mergers and acquisitions services. Mr Djanogly will provide advice on developing the company's strategy, its corporate governance, and assist it in its transactional work.

When considering the application the Committee noted his earlier career in commercial law and that he had had no dealings with Oakley Capital as a Minister. It also noted that he was not subject to the three-month waiting period imposed on former Cabinet Ministers.

**The Committee saw no reason why he should not incorporate a consultancy company and accept work with Oakley Capital Ltd forthwith, subject to the conditions that:**

**- for 12 months from his last day in office, he should not undertake any work which involves providing advice to any company or organisation on issues relating to the work of Ministry of Justice;**

**- that, for two years from the same date, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of any of his clients; and**

**- once he has received approval to set up as an independent consultant, he must, for two years from his last day in office, seek confirmation from the Committee 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 would be expected to submit a fresh application.**

<b>Date of approval</b> <a href="#">Approval Letter</a>	November 2012
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**Non Executive Director of Pembroke Venture Capital Trust PLC**

Took up new employment	February 2013
<p>Mr Djanogly sought advice about accepting a non-executive director of Pembroke VCT plc. Pembroke VCT plc, a proposed venture capital trust to be listed in November 2012, Mr Djanogly will receive an annual director's fee.</p> <p>When Considering the application the Committee noted your earlier career in commercial law and that you had had no dealings with Pembroke VCT as a Minister. It also noted that you are not subject to the three-month waiting period imposed on former Cabinet Ministers.</p> <p><b>The Committee saw no reason that why you should not accept this appointment forthwith subject to the conditions that:</b></p> <p><b>- for 12 months from your last day in office, you should not undertake any work which involves providing advice to any company or organisation on issues relating to the work of Ministry of Justice; and</b></p> <p><b>- for two years from the same date, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of any of his new employers.</b></p>	
<b>Date of approval</b> <a href="#">Approval Letter</a>	November 2012
<p><b>James Duddridge</b> Former Lord Commissioner of HM Treasury and Government Whip</p>	
Left Office	September 2012
<b>Adviser, Wilcocks &amp; Associates Ltd</b>	
Took up new appointment	March 2013
<p>Mr Duddridge sought advice about accepting a part-time, paid role as an adviser to Wilcock's &amp; Associates, a wealth management company established in 2005, which delivers an integrated estate planning, financial planning and investment management service to over 300 clients. He will advise the Directors on strategy and business development. The role will not involve any lobbying of Government.</p> <p>When considering the application, the Committee took into account that Mr Duddridge did not have any direct official or contractual dealings with his prospective employer during his last two years of service. Furthermore, he did not have access to commercially sensitive information about any competitors. The Committee also noted that over five months had passed since he left office.</p> <p><b>The Committee advised him that he could accept the appointment forthwith, subject to the conditions that he should not draw on any privileged information from his time in Government and that, for two years from the date of his leaving office, he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.</b></p>	
<b>Date of approval</b> <a href="#">Approval letter</a>	February 2013

<b>Trustee/Director and Consultant, Grown Volunteer Consulting</b>	
Took up new appointment	April 2013
<p>Mr Duddridge sought advice about accepting a part-time, unpaid role of Trustee/Director and Consultant with Grown Volunteer Consulting. Grown Volunteer Consulting is a charity that provides free business consulting to micro, small and medium sized enterprises in developing countries. It aims to enhance the skills of local entrepreneurs to lead their countries out of poverty.</p> <p><b>The Committee advised him that he could accept the appointment forthwith, subject to the conditions that he should not draw on any privileged information from his time in Government and that, for two years from the date of his leaving office, he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.</b></p>	
<b>Date of approval</b> <a href="#">Approval letter</a>	March 2013
<b>Nick Gibb</b> Former Minister of State for Schools, Department for Education	
Left Office	September 2012
<b>Member of the Advisory Council of Civitas' Curriculum Project</b>	
Took up new appointment	February 2013
<p>Mr Gibb sought advice on accepting an unpaid, part-time appointment with the independent think tank Civitas, which has set up the Curriculum Project to encourage schools to adopt a more knowledge-based curriculum. Mr Gibb has been asked to join the Project's Advisory Council.</p> <p>When considering the application, the Committee noted that Mr Gibb had dealings with Civitas whilst in Government and that his ministerial responsibilities included the implementation of the Curriculum Review. It also noted that he had contact with a number of other think tanks and academy chains whilst in office but had no access to commercially sensitive information about them. Given the nature of his ministerial role, the Committee recognised that such contacts were to be expected and, particularly as the appointment would be unpaid, it does not consider that it could reasonably be perceived as a reward. Furthermore, the Committee took into account the fact that it is now almost five months since he left Government.</p> <p><b>On the understanding that he would not draw on any privileged information from his time in Government, the Committee saw no reason why he should not take up this appointment forthwith, subject to the condition that, for two years from the date of his leaving office, he should not become personally involved in lobbying the UK Government on behalf of Civitas or its clients.</b></p>	
<b>Date of approval</b> <a href="#">Approval letter</a>	February 2013
<b>Trustee, The David Ross Education Trust</b>	
Took up new appointment	February 2013

Mr Gibb sought advice on accepting an appointment as a Trustee of The David Ross Education Trust, part of The David Ross Foundation, an independent grant-making foundation operating in England and Wales. The Foundation aims "to further such charitable purposes and to benefit such charitable institutions as the trustees think fit". It manages a number of Academy Schools (both secondary and primary) on behalf of the Secretary of State.

The Committee noted that, whilst in Government, he had dealings with the Foundation. It also noted that he had contact with a number of other academy chains whilst in office but had no access to commercially sensitive information about them. Given the nature of his ministerial role, the Committee recognised that such contacts are to be expected and, particularly as the appointment is unpaid, it does not consider that any could reasonably be perceived as a reward. Furthermore, the Committee took into account the fact that it is now almost five months since he left Government.

**On the understanding that he would not draw on any privileged information from his time in Government, the Committee saw no reason why he should not take up this appointment forthwith, subject to the condition that, for two years from the date of his leaving office, he should not become personally involved in lobbying the UK Government on behalf of his new employer.**

<b>Date of approval</b> <a href="#">Approval letter</a>	February 2013
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**Member of the Mayor of London's Expert Advisory Group for the London Schools' Excellence Fund**

Took up new appointment	February 2013
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Mr Gibb sought advice on accepting a part-time, unpaid appointment as a member of the Expert Advisory Group of the London Schools' Excellence Fund, which was set up by the Mayor of London to provide grants to selected London schools in order to drive progress towards higher academic standards, particularly in literacy and maths in primary schools and science, maths and languages in secondary schools. Of the £24.25 million in the Fund, £20 million will come from the DfE and £4.25 million from the Greater London Authority (GLA). The Expert Advisory Group will advise the senior GLA officials who make the decisions on priorities and grant recommendations for the Fund.

The Committee noted that, whilst in Government, Mr Gibb had dealings with the GLA. It also noted that he had contact with a number of think tanks and academy chains whilst in office but had no access to commercially sensitive information about them. Given the nature of his ministerial role, the Committee recognised that such contacts are to be expected and, particularly as the appointment is unpaid, it does not consider that any could reasonably be perceived as a reward. Furthermore, the Committee took into account the fact that it is now almost five months since he left Government.

**On the understanding that he would not draw on any privileged information from his time in Government, the Committee saw no reason why he should not take up this appointment forthwith, subject to the condition that, for two years from the date of his leaving office, he should not become personally involved in lobbying the UK Government on behalf of his new employer.**

<b>Date of Approval</b> <a href="#">Approval letter</a>	February 2013
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**Sir Nick Harvey**

<b>Former Minister of State for the Armed Forces, Ministry of Defence</b>	
Left Office	September 2012
<b>Consultant, Global Partners and Associates Ltd</b>	
Took up new appointment	February 2013
<p>Sir Nick sought advice on accepting a part-time, paid appointment as a consultant for Global Partners and Associates Ltd. Global Partners was established in 2005 to promote democratic politics, effective governance and human rights around the world by developing policy and practice and delivering projects. It works with donors and governments, civil society organisations and private sector partners. As a consultant, he will be contributing to programmes helping legislatures, their committees and political parties develop their effectiveness within functioning democracies. He states that there will be no lobbying of UK Government of any sort.</p> <p>When considering his application, the Committee took into account that he did not have any direct official or contractual dealings with his prospective employer during his last two years of service. Furthermore, he did not have access to commercially sensitive information about any competitors and he was not involved in the development or administration of any departmental policy or decisions that could have affected his prospective employer. The Committee also noted that it is now five months since he left ministerial office.</p> <p><b>The Committee advised him that, on the understanding that he would not draw on any privileged information available to him as a Minister, it saw no reason why he should not take up the appointment forthwith, 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.</b></p>	
<b>Date of approval</b> <a href="#">Approval Letter</a>	February 2013
<b>Charles Hendry</b> Former Minister for Energy, Department for Energy and Climate Change	
Left Office	September 2012
<b>Visiting Professor, University of Edinburgh</b>	
Took up new appointment	November 2012
<p>Mr Hendry sought advice concerning a part-time, unpaid appointment as a Visiting Professor at Edinburgh University. As well as lecturing students and taking tutorial groups at the University's new Academy of Government, he will support academic research undertaken by the University's Business School, assisting students to understand government better, and help them understand the relationship between energy policy-making and business.</p> <p>The Committee noted that he had had some official dealings with the University in relation to its expertise on, and support for the development of, carbon capture and storage technologies, but that the Visiting Professorship did not involve this work.</p> <p><b>The Committee advised him that it saw no reason why he should not accept the appointment forthwith, subject to the condition that, for two years from his last day in office, he should</b></p>	

<b>not become personally involved in lobbying Government on behalf of his new employer.</b>	
<b>Date of approval</b> <a href="#">Approval letter</a>	November 2012
<b>Chairman, Forewind Ltd</b>	
Took up new appointment	February 2013
<p>Mr Hendry sought advice on accepting a part-time, paid appointment as Chairman of Forewind Ltd, a consortium of four leading energy companies (RWE, SSE, Statkraft and Statoil) that was set up to bid for a zone development agreement as part of The Crown Estate's third license round for UK offshore wind farms. His role will include: chairing Forewind Ltd's board meetings, providing leadership of the board and planning its meetings; and representing Forewind Ltd at events and meetings. He will not have any executive responsibility for the day-to-day running of Forewind Ltd and will not have a vote on the board's decisions. He confirmed that the role will not involve any lobbying of Government.</p> <p>The Committee noted that he had official dealings with his prospective employer and its parent companies in the last two years in Government as Forewind Ltd would have attended industry meetings and Forewind Ltd's parent companies would have taken part in meetings to discuss energy matters. Mr Hendry confirmed, however, that his dealings with Forewind Ltd and its parent companies would not have involved the award of grants or regulatory work.</p> <p>The Committee also noted that, during his last two years in office, he had official dealings with competitors of his prospective employer/its parent companies in that all the major energy companies would attend similar meetings to those that Forewind's parent companies attended. However, Mr Hendry confirmed that those meetings would invariably focus on wider energy issues than offshore wind, which is the sole business activity of Forewind Ltd. The Committee took into account that Forewind Ltd already have their licence for the development of Dogger Bank and are, therefore, not in a competitive situation. Finally, the Committee noted that he left ministerial office four months ago.</p> <p><b>Taking all of these factors into account and noting that the three month waiting period that it would have been minded to impose has already expired, the Committee advised him that he could take up this appointment, subject to the conditions that:</b></p> <ul style="list-style-type: none"> <li>- he should not draw on any privileged information from his time in Government; and</li> <li>- for two years from the date of his leaving office, he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent companies or their clients.</li> </ul>	
<b>Date of approval</b> <a href="#">Approval letter</a>	January 2013
<b>The Rt Hon the Lord Howell of Guildford</b> Former Minister of State, Foreign and Commonwealth Office	
Left Office	September 2012
<b>Senior Adviser, Japan Central Railway Company Ltd (JR Central)</b>	
Took up new appointment	December 2012

Lord Howell sought advice concerning a part-time, paid appointment with JR Central, a high speed rail operator in the Chubu region of central Japan. Before joining the Government in May 2010, Lord Howell had spent seven years as a Senior Adviser to the company, providing intermittent strategic background advice to its leading members both in the UK and Japan, and now wished to resume this role.

The Committee noted that, whilst in Government, Lord Howell had no significant official dealings with JR Central, its parent company or its competitors, and that he did not anticipate any lobbying of government in his new role.

**On the understanding that he would not draw on any privileged information from his time in office, the Committee advised him that it saw no reason why he should not resume the appointment forthwith, subject to the condition that, for two years from his last day in office, he should not become personally involved in lobbying UK Government on behalf of his new employer.**

<b>Date of approval</b> <a href="#">Approval letter</a>	September 2012
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**Economic Adviser, British Chamber of Commerce**

Took up new appointment	January 2013
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Lord Howell sought permission to take up the part-time, unpaid position as economic adviser to the British Chamber of Commerce (BCC), the independent business network which works with and represents businesses. He will be member of a panel of economic advisers who meet four times a year to advise the BCC on economic developments generally as well as "broad geo-political and global market issues".

The Committee noted that, whilst in Government, he did not have any significant contact with the BCC and he was not involved with any competitors. The Committee also noted that the appointment is unpaid and that it would be in line with supporting the UK's prosperity objectives. Furthermore, the Committee took into account the fact that four months had passed since he left Government but that he currently acts as personal adviser to the Foreign Secretary on energy and resource security.

**On the understanding that he would not draw on any privileged information from his time in Government, or in his current capacity as personal adviser to the Foreign Secretary on energy and resource security, the Committee saw no reason why he should not take up this appointment forthwith, subject to the condition that:**

**- for two years from the date of his leaving office, he should not become personally involved in lobbying the UK Government on behalf of his new employers or their clients.**

<b>Date of approval</b> <a href="#">Approval letter</a>	January 2013
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**Adviser, Kuwait Investment Office**

Took up new appointment	February 2013
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Lord Howell sought advice on resuming a part-time appointment as an adviser to the Kuwait Investment Office, the branch office of the Kuwait Investment Authority (KIA) in the City of London and manages funds on behalf of the State of Kuwait. He will meet managers intermittently to advise on international investment strategy. He does not anticipate any lobbying or contact with government of

any kind.	
<p>The Committee noted that, whilst in government, he did not have official dealings with his prospective employer, parent company or competitors. The Committee also noted that he did not anticipate any lobbying of government in this role.</p> <p><b>On the understanding that he would not draw on any privileged information from his time in government, the Committee advised him that it saw no reason why he should not resume the appointment forthwith, subject to the condition that:</b></p> <p><b>- for two years from the date of his leaving office, he should not become personally involved in lobbying UK government on behalf of his new employer or its clients.</b></p>	
<b>Date of approval</b> <a href="#">Approval letter</a>	October 2012
<b>Adviser, Mitsubishi Electric, Europe</b>	
Took up new appointment	March 2013
<p>Lord Howell sought advice about accepting a part-time, paid appointment (working one day per month) as an adviser to Mitsubishi Electric, Europe. Mitsubishi Electric is a Japanese multinational company that offers a range of industrial, commercial and consumer electric and electronic products. It is one of the core companies of the Mitsubishi Group.</p> <p>When considering the application, the Committee took into account that, whilst in Government, he not have official dealings with his prospective employer or its competitors. The Committee also noted that he did not anticipate any lobbying of UK Government in this role.</p> <p><b>The Committee advised him that, on the understanding that he would not draw on any privileged information from his time in Government, it saw no reason why he should not resume the appointment forthwith, subject to the condition that:</b></p> <p><b>- for two years from the date of his leaving office, he should not become personally involved in lobbying UK Government on behalf of his new employers or their clients.</b></p>	
<b>Date of Approval</b> <a href="#">Approval letter</a>	December 2012
<b>The Rt Hon Chris Huhne</b> Former Secretary of State, Department for Energy and Climate Change	
Left Office	February 2012
<b>Consultant, Nationwide Energy Services Ltd</b>	
Took up new appointment	October 2012
<p>Mr Huhne sought advice about an appointment he wished to take up acting as a consultant to Nationwide Energy Services Ltd, who advise customers on energy efficient improvements they can make on their homes.</p> <p>The Committee noted that, during his two years in office, Mr Huhne had no official dealings with</p>	



Nationwide Energy Services or its competitors, and that the company had no direct contracts with DECC. It also received assurances from Mr Huhne that he would not advise the company on any contract with DECC, lobby government on its behalf or use any privileged information gained whilst in office.

**The Committee advise Mr Huhne that it saw no reason why he should not take up the appointment subject to:**

- a waiting period of six months from his last day in office; and
- the condition that, for two years from the same date, he should not become personally involved in lobbying Government on behalf of his new employer.

<b>Date of approval</b> <a href="#">Approval letter</a>	May 2012
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**Tim Loughton MP**  
Former Parliamentary Under-Secretary of State for Children and Families, Department for Education

Left office	September 2012
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**Trainer, Cumberlege Connections**

Took up new appointment	March 2013
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Mr Loughton sought advice on a post as a Trainer at Cumberlege Connections. This is a part-time, paid position working three and a half days per year. Cumberlege Connections delivers leadership and political awareness programmes to health sector clients.

The Committee took into account the fact the Mr Loughton was involved with Cumberlege Connections on a similar basis before he became a Minister, but he did not have official dealings with the company or any competitors during his last two years in office.

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

- he should not draw on any privileged information from his time in Government;
- for two years from the date of him leaving office, he should not become personally involved in lobbying the UK Government on behalf of your new employer or its clients.

<b>Date of approval</b> <a href="#">Approval letter</a>	March 2013
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**Member of the Advisory Board, Community Service Volunteers**

Took up new appointment	March 2013
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Mr Loughton sought advice on a post as a member of the Advisory Board at Community Service Volunteers (CSV). The role is unpaid working one day a year. Community Services Volunteers is the UK's largest volunteering and training charity.

The Committee took into account that Mr Loughton has had official dealings with CSV previously as

they were regular contributors to consultation exercises within the DFE but did not have dealings with any competitors.

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

- he should not draw on any privileged information from his time in Government;
- for two years from the date of him leaving office, he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.

<b>Date of approval</b> <a href="#">Approval letter</a>	March 2013
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**Honorary Member of the Board of Advisors, London Capital Club**

Took up new appointment	March 2013
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Mr Loughton sought advice on a part-time, unpaid role as Honorary Member of the Board of Advisors to the London Capital Club. The London Capital Club is an exclusive private club. The Club is operated by CCA International who, for over 25 years, have been involved in developing and operating private clubs in Asia and Europe.

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

- he should not draw on any privileged information from his time in Government;
- for two years from the date of him leaving office, he should not become personally involved in lobbying the UK Government on behalf of your new employer or its clients.

<b>Date of approval</b> <a href="#">Approval letter</a>	March 2013
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**Independant Conualtant, the National Fostering Agency**

Took up new appointment	April 2013
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Mr Loughton sought advice on a part time, paid role as a independant consultant to the National Fostering Agency (NFA). The NFA is the second largest independent child fostering agency in the United Kingdom with over 1,500 foster carrers looking after more than 2,000 foster children.

**The Committe advised Mr Loughton that it saw no reason why he should not take up the appointment subject to:**

- that he should not draw on any privileged information from his time in Government;
- for two years from the date of your leaving office, he should not become personally involved in lobbying the UK Goernment on behalf of his new employers, their parent companies or their clients.

Date of Approval	March 2013
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<a href="#">Approval Letter</a>	
<b>Chairman of the Mindful Policy Group</b>	
Took up new appointment	May 2013
<p>Mr Loughton sought advice on a part time, paid role as Chairman of the Mindful Policy Group (MPG). The MPG is a newly formed company that brings together an informal group of child psychologists on a commercial basis. It promotes evidence-based psychological, biological and social research into the psychological welfare and health of children, providing resources such as training, conferences, and publications.</p> <p><b>The Committee advised Mr Loughton that it saw no reason why he should not take up the appointment subject to the conditions that:</b></p> <p><b>- he should not draw on any privileged information from his time in Government; and</b></p> <p><b>-for two years from the date of leaving office, he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.</b></p>	
Date of Approval <a href="#">Approval Letter</a>	February 2013
<p><b>Peter Luff</b> Former Minister for Defence Equipment, Support and Technology, Ministry of Defence</p>	
Left office	September 2012
<b>Member of the Advisory Board, Northern Defence Industries (NDI)</b>	
Took up new appointment	November 2012
<p>Mr Luff sought advice on an honorary, unpaid role he had been offered by the NDI, which provides business support services and research services to small and medium-sized enterprises in the defence, aerospace, space and security sectors. It works closely with MOD and UKTI, prime contractors and systems integrators to create business growth for its members. Mr Luff has been asked to join its Advisory Board.</p> <p>When considering the proposed appointment, the Committee noted that it was an honorary, unpaid role, that the Advisory Board (which already includes a number of MOD officials) advises on the NDI's <b>STRATEGIC</b> direction, and that almost three months had passed since Mr Luff left office.</p> <p><b>On this basis, the Committee saw no reason why Mr Luff should not take up the appointment forthwith, subject to the condition that:</b></p> <p><b>- for two years from his last day in office, he should not undertake any work which involves providing advice to any company or organisation on the terms of any bid or contract relating to the work of the Ministry of Defence: and</b></p> <p><b>- for two years from the same date, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including special advisers, on behalf of his new employer.</b></p>	

<b>Date of approval</b> <a href="#">Approval letter</a>	November 2012
<b>Non-Executive Director, Marlin Group Holdings plc</b>	
Took up new appointment	February 2013
<p>Mr Luff sought advice on a post as a Non Executive Director at the Marlin Group. This is a part-time, paid position working one/one and a half days per month. Marlin Group is involved in providing bespoke automated manufacturing systems and services for manufacturers in a diverse range of markets, including: automotive; civil aerospace; medical devices; contact lenses; and food.</p> <p>In reaching a decision on the appropriate conditions to impose, the Committee took into account the fact that he confirmed that none of Marlin’s work is with or is likely to be with the Government, although the Committee noted that Marlin will work for manufacturers that supply the Government from time to time. As the Government is not one of Marlin’s customers, he confirmed that he did not anticipate any lobbying of Government in this role. In considering his application, the Committee also noted that he had no official dealings with his prospective employer, its parent company or its competitors during his last two years in Government. The Committee also noted that there is no apparent relationship between his prospective employer and his former Department, so his appointment is sufficiently removed from his ministerial responsibilities. Furthermore, the Committee took into account the fact that it is now four months since he left office.</p> <p><b>On the understanding that he should not draw on any privileged information available to him from his time in Government, the Committee advised him that it saw no reason why he should not take up the appointment forthwith subject to the condition that:</b></p> <p><b>- 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, its parent company or its clients.</b></p>	
<b>Date of Approval</b> <a href="#">Approval Letter</a>	January 2013
<b>Chairman, Democracy Forum</b>	
Took up new appointment	January 2013
<p>Mr Luff, sought advice on the part-time, paid post of Chairman of the Democracy Forum. The Democracy Forum was established in 2009. It is a not for profit organisation, which is funded by its supporters. Its aim is to promote peace, democracy and harmony as an alternative to terrorism, dictatorship and discord. His role as Chairman will be to oversee the activities of the Forum and help develop ideas and new contacts who can help strengthen democratic thinking. Mr Luff said that he will be required to Chair around three seminars each year in the United Kingdom and India. No lobbying of Government is required in this role.</p> <p>When considering the application the Committee took the fact he did not anticipate any lobbying of Government in this role. The Committe noted that he did not have any offial deaingns with his prospective employer or its competitors during his last two years in Government. It also noted that there is no apparent relationship between his employer and his former Department and his ministerial office. Furthermore, the Committee took into account the fact it is now over four months since he left office.</p>	

**On the understanding that he would not draw on any privileged information from his time in Government, the Committee saw no reason why he should not take up the appointment forthwith subject to the condition that:**

**- for two years from the date of him leaving office, he should not become personally involved in lobbying UK Government on behalf of his new employer or their clients.**

<b>Date of approval</b> <a href="#">Approval Letter</a>	January 2013
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**Lord Marland of Odstock**  
Former Parliamentary Under-Secretary, Department for Business, Innovation and Skills

Left office	January 2013
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**Non-Executive Director, Tamara Mellon Inc**

Took up new appointment	March 2013
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Lord Marland sought permission to accept a part-time post as a Non-Executive Director of Tamara Mellon Inc, representing shareholders' interests.

When considering this application the Committee took into account the fact that Lord Marland had known Ms Mellon for a number of years and collaborated on projects prior to being a Minister. It considered the fact that Ms Mellon had joined two trade missions with Lord Marland, but also that he had not had access to any commercially sensitive information about competitors. The Committee noted that Lord Marland's investment in Tamara Mellon Inc will be through a bespoke solely owned company (Wilton Place Inc). The sole purpose of the company (of which he will be the Director) is the particular investment in Tamara Mellon Inc.

**The Committee advised Lord Marland that it saw no reason why he should not take up the appointment forthwith, subject to the conditions that:**

**- he should not draw on privileged information available to him as a Minister or in his role as the Prime Minister's Trade Envoy;**

**- he should make it clear in any activities he undertakes on behalf of his new employer that he is acting as their representative and not as a Government representative; 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 their clients.**

<b>Date of approval</b> <a href="#">Approval letter</a>	March 2013
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**Chairman, Herriot Ltd**

Took up new appointment	January 2013
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Lord Marland sought permission to accept a part-time appointment as Chairman of Herriot Ltd, an investment company that Lord Marland owns and that he co-founded in 1989.

When considering this application, the Committee took into account the fact that there had been no

relationship between Herriot Ltd and Lord Marland’s former department, nor had he had any dealings with competitors of the company. They further noted that Lord Marland had remained principal shareholder of the company whilst in Government, but that he had not been involved in any decision making.

**The Committee advised Lord Marland that it saw no reason why he should not take up the appointment forthwith, subject to the conditions that:**

- he should not draw on privileged information available to him as a Minister or in his role as the Prime Minister’s Trade Envoy;
- he should make it clear in any activities he undertakes on behalf of his new employer that he is acting as their representative and not as a Government representative; 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 their clients.

<b>Date of approval</b> <a href="#">Approval letter</a>	March 2013
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**The Rt Hon Andrew Mitchell**  
Former Government Chief Whip

Left Office	October 2012
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**Member of the Advisory Board, The Foundation**

Appointment taken up	February 2013
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Mr Mitchell sought advice about resuming his membership of the Advisory Board of The Foundation, a growth and innovation consultancy which helps clients to achieve long-term, sustainable growth through innovation. Clients include Marks & Spencer, Audi, Visa, HSBC and Comic Relief. As a member of the Board Mr Mitchell will advise the company on its business development. The role is part-time and paid.

When considering his request the Committee took into account the nature of The Foundation's work, and the fact that, while Mr Mitchell had been a member of its Advisory Board for ten years before joining Government, he had no dealings with the company or its competitors whilst in office. Nor was there any connection between the company’s work and his Ministerial roles as either Secretary of State for International Development or Chief Whip. The Committee also noted that he was no longer subject to the three-month waiting period usually observed by former Cabinet Ministers before they take up a new appointment.

**As the three-month waiting period usually observed by former Cabinet Ministers had expired, the Committee saw no reason why he should not accept this appointment forthwith subject to the condition that:**

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

<b>Date of approval</b> <a href="#">Approval letter</a>	February 2013
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<b>Strategic Adviser, Montrose Associates</b>	
Appointment taken up	March 2013
<p>Mr Mitchell sought advice on a part-time paid appointment as a Strategic Adviser to Montrose Associates. Montrose Associates “provides its clients with the strategic intelligence, insights and perspective to help them to take the best possible decisions”. This includes advice on reputational risk management, political and security analysis, and support and acquisitions.</p> <p>When considering the request the Committee noted that there was no connection between Montrose Associates and his Ministerial roles, and that he had no official dealings with them or their competitors. The Committee also noted that he was no longer subject to the three-month waiting period usually observed by former Cabinet Ministers before they take up a new appointment.</p> <p><b>As the three-month waiting period usually observed by former Cabinet Ministers had expired, the Committee saw no reason why he should not accept this appointment forthwith subject to the condition that:</b></p> <p><b>- for two years from his last day in office, he should not become personally involved in lobbying UK Government, on behalf of his new employer or its clients.</b></p>	
<b>Date of approval</b> <a href="#">Approval letter</a>	March 2013
<b>Baroness Morgan of Dreflin</b> Former Parliamentary Under-Secretary of State, Children and Families	
Left Office	May 2010
<b>Chief Executive, Breast Cancer Campaign</b>	
Appointment announced Appointment taken up	April 2011 July 2011
<p>Baroness Morgan sought advice on a full-time appointment as Chief Executive of the Breast Cancer Campaign. The appointment had already been announced in April 2011 but she was not due to take it up until July.</p> <p>The Committee noted with concern that the appointment had been accepted before advice was sought.</p> <p><b>Had her application been made at the correct time, the Committee would have advised that it saw no reason why she should not take up the appointment forthwith.</b></p>	
<b>Date of approval</b>	May 2011
<b>Bob Neill</b> Former Parliamentary Under-Secretary of State, Department for Communities and Local Government	
Left Office	September 2012
<b>Contributor, The MJ</b>	

Took up new appointment	November 2012
<p>The MJ (formerly The Municipal Journal) is a weekly magazine aimed at council Chief Executives and senior managers, councillors and the private sector working with local authorities. Mr Neill sought advice about contributing occasional articles on the current political scene tailored to the interests of The MJ's readers. In addition, he will also speak at some of their conferences and seminars.</p> <p>When considering the application, the Committee noted that Mr Neill had given interviews to Th MJ as a Minister to explain Government policy and that he also spoke at events it had organised, but that he had no involvement with them beyond that.</p> <p><b>The Committee advised him that it saw no reason why he should not accept the appointment forthwith subject to the conditions that:</b></p> <p><b>- for two years from his last day in office, he should not become personally involved in lobbying UK Government on behalf of his new employer and that he should not draw on privileged information available to him as a Minister.</b></p>	
<b>Date of approval</b> <a href="#">Approval letter</a>	November 2012
<p><b>The Rt Hon Baroness Neville-Jones DCMG</b> Former Minister of State for Security and Counter Terrorism, Home Office</p>	
Left Office	May 2011
<b>Member of the UK Advisory Board of Brooks International</b>	
Took up new appointment	October 2012
<p>Baroness Neville-Jones sought advice on an appointment she wished to take up on the UK Advisory Board of the international management services company, Brooks International.</p> <p>The Committee noted that it had been some fifteen months since she left Government and that she had had no dealings with her prospective employer or its competitors.</p> <p><b>On the understanding that she would not draw on any privileged information from her time in Government, the Committee saw no reason why she should not take up the appointment forthwith subject to the condition that:</b></p> <p><b>- for two years from leaving office, she should not become personally involved in lobbying Government on behalf of her new employer or its clients.</b></p>	
<b>Date of approval</b> <a href="#">Approval letter</a>	August 2012
<p><b>Rt Hon Stephen O'Brien MP</b> Prime Minister's Envoy and Special Representative for the Sahel at the Foreign &amp; Commonwealth Office</p>	
Left office	September 2012
<b>Trustee and Non-Executive Director, Liverpool School of Tropical Medicine</b>	



Took up new appointment	March 2013
<p>Stephen O'Brien MP sought permission to accept a part-time unpaid appointment as Trustee and Non-Executive Director of the Liverpool School of Tropical Medicine (LSTM). The Liverpool School of Tropical Medicine (LSTM) was the first research and teaching institution in the world dedicated to tropical disease and leads in the fight against infectious, debilitating and disabling diseases. A registered charity, it works in over 60 countries worldwide in order to improve the health of the world's poorest people.</p> <p>When considering the application the Committee noted that Mr O'Brien did have official dealings with 'competitors' of LSTM and had the occasional meetings on general policy matters. However, he did not have access to any commercially sensitive information about them and they are were not competitors in a commercial sense in any event. The Committee also noted that it has now been nearly six months since Mr O'Brien left office.</p> <p><b>Taking into account all the circumstances, the Committee advised Mr O'Brien that he can accept the appointment with LSTM forthwith, subject to the following conditions:</b></p> <ul style="list-style-type: none"> <li>- that he should not draw on any privileged information available to him from his time in Government including in his current capacity as the Prime Minister's Envoy and Special Representative;</li> <li>- that he should make it clear in any activities that he undertakes on behalf of his new employer that he is acting as their representative and not as a Government representative; and</li> <li>- for two years from his last day in office, he should not become personally involved in lobbying UK Government on behalf of his new employer or its clients.</li> </ul>	
<b>Date of approval</b> <a href="#">Approval letter</a>	March 2013
<p><b>The Rt Hon Lord Sassoon Kt</b> Former Commercial Secretary to the Treasury, HM Treasury</p>	
Left Office	January 2013
<p><b>Director, Matheson &amp; Co Ltd</b></p>	
Took up new appointment	January 2013
<p>Lord Sassoon sought advice about an appointment he wished to take up as a Director of Matheson &amp; Co, which provides support services to the subsidiary and associated companies of the Jardine Matheson Group, an Asia-based conglomerate with a broad portfolio of businesses. Lord Sassoon will join a small team providing strategic advice to the Group's Chairman and senior executives and will network globally in support of the Group's businesses, particularly through initiatives to help British businesses win more business in Asia. He would also become a director of Jardine Matheson Holdings, Hong Kong Land Holdings Ltd, Mandarin Oriental International Ltd, and Dairy Farm International Ltd.</p> <p>The Committee noted that in his Commercial Secretary role he was involved in a broad range of policies that affect all UK companies. It noted that that he had no direct official dealings with his prospective employer since becoming Commercial Secretary to the Treasury in May 2010 and that, while he and other ministers participate in Asia-focused business groups in which the Jardine Matheson Group also</p>	

participates, his involvement had been limited to giving talks to associations within the UK and that he had not led any trade missions to the Far East. The Committee noted that, although he anticipated some limited involvement with the UK Government in his new role, this would not involve any lobbying for business from the UK Government or lobbying the UK Government on policy matters.

**On the understanding that he would not draw on any privileged information from his time in Government and that there were no changes in the circumstances of his application up to the date of his leaving office in January 2013, the Committee advised him that it saw no reason why he should not take up the appointment as described, subject to the conditions that:**

**- for three months from his last day in office, his activities on behalf of his new employer would be strictly limited to matters directly concerning the company's interests in Asia, and that he would have no involvement in its UK business or operation;**

**- for 12 months from the same date, he should not provide advice to his new employer, or any subsidiary of the Jardine Matheson Group, on the terms of any bid or contract directly relating to HM Treasury; and**

**- for two years from the same date, he should not become personally involved in lobbying the UK Government on behalf of his new employer or any subsidiary of the Jardine Matheson Group.**

Sir Hugh Stevenson recused himself from consideration of this application as he is a friend of Lord Sassoon.

<b>Date of approval</b> <a href="#">Approval letter</a>	December 2012
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**Non-executive Director, Jardine Lloyd Thompson Group plc**

New appointment announced	March 2013
To be taken up	April 2013

Lord Sassoon sought advice on accepting a part-time appointment as a non-executive director of Jardine Lloyd Thompson Group (JLT), one of the world's largest groups of risk specialists and employee benefits consultants. JLT is an associated company of Jardine Matheson Holdings, of which Lord Sassoon is currently an Executive Director (see above), and Jardine Matheson Holdings has two seats on JLT's Board. As part of his non-executive directorship, Lord Sassoon will be required to sit on the Audit and/or Remuneration Committees. The post is part-time, working twelve days per year, and his Director's fees will be surrendered to Jardine Matheson Holdings. He confirms that there will be no requirement to lobby Government in this role.

When considering this application the Committee took into account that he had official dealings with his prospective employer within his last two years in office in that executives of JLT may have been present at events in which he participated as a Minister. While he had a broad role to consider City competitiveness and general pro-growth policies, neither this nor his role as Treasury spokesperson in the Lords involved any specific consideration of issues particular to JLT, as far as Lord Sassoon was aware. Furthermore, whilst JLT had a creative role in the development of the NewBuy Government backed mortgage indemnity scheme (launched by the Department for Communities and Local Government in March 2012) and whilst it administers the scheme for the Home Builder Federation and Council of Mortgage Lenders, he was not involved in the project.

The Committee took into account that he had official dealings with competitors of his prospective

employer in that he attended events and had discussions with one competitor about the possible re-domicile of their business in London. The Committee noted that he did not have access to commercially sensitive information from these dealings. The Committee also noted that there will be no requirement to lobby Government in his proposed role.

**Notwithstanding this, the Committee felt that, since JLT operates within the UK and has had some meaningful dealings with Government (as set out above) a waiting period between his leaving office and taking up the appointment would be appropriate. However, noting that he did not propose to take up the appointment until 30 April 2013 (by which time the three month waiting period that the Committee would have been minded to impose will have expired), it advised him that it saw no reason why he should not take up the appointment, subject to the following conditions:**

- that he should not draw on any privileged information available to him as a Minister;
- for 12 months from his last day in office, he should not provide advice to his new employer, or any clients, on the terms of any bid or contract directly relating to HM Treasury; and
- for two years from the same date, he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.

Lord Lang recused himself from consideration of this application as he is Chairman of a competitor company. Sir Hugh Stevenson recused himself as he is a friend of Lord Sassoon.

<b>Date of approval</b> <a href="#">Approval letter</a>	February 2013
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**Member of the Committee of the Hong Kong Association**

Took up new appointment	April 2013
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Lord Sassoon sought advice on seeking permission to accept a part-time (working three days per year), unpaid appointment as a member of the Committee of the Hong Kong Association (HKA).

The HKA includes most of the principal British companies investing and doing business in Hong Kong, as well as leading Hong Kong companies active in the United Kingdom. The HKA's main activities, in support of its mission, are to host events for its members at which speakers include members of the UK Government and civil service, and of the Hong Kong administration, business people involved with Hong Kong, economists and academics.

When considering his application the Committee took into account whilst in Government, he had dealings with your prospective employer in the broadest sense in that the HKA was one of the many organisations that asked him to speak to them, which he did in May 2011. The Committee took into account that you have not had any dealings with any of your prospective employer's competitors.

The Committee also noted, whilst the HKA interacts with the UK, Hong Kong and Chinese administrations, it is not involved in lobbying for specific business. Its aim is to foster the understanding of issues and links between organisations and business people in the UK and Hong Kong.

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

- 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 provide advice to his new employer, or any clients, on the terms of any bid or contract directly relating to HM Treasury; 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 or its clients.**

Sir Hugh Stevenson recused himself as he is a friend of Lord Sassoon.

<b>Date of approval letter</b> <a href="#">Approval letter</a>	February 2013
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**Lord Strathclyde**  
Former Leader of the House of Lords

Left Office	January 2013
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**Senior Adviser - Battersea Power Station**

Took up new appointment	June 2013
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The Advisory Committee on Business Appointments has received an approach from Lord Strathclyde, for advice on accepting a part time, paid appointment as a senior adviser to Battersea Power Station Development Company (BPSDC).

Battersea Power Station is one of the world's most famous buildings in the heart of Central London, which is being redeveloped by BPSDC. When considering the application the Committee took into account that you he did not have any direct official dealings with his prospective employer during his last two years in office. Furthermore, he did not have access to commercially sensitive information about any competitors and he will not be required to lobby Government in his proposed role. The Committee also noted the fact it is now five months since he left ministerial office.

Taking into account all the circumstances, and noting that the usual three month waiting period that the Committee would normally attach to appointments taken up by former Cabinet Ministers has now expired.

**The Committee saw no reason why he should not accept this appointment 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 UK Government on behalf of his new employer, its parent company or its clients.**

Date of Approval <a href="#">Approval Letter</a>	June 2012
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## Annex C

# BUSINESS APPOINTMENT RULES FOR CIVIL SERVANTS

The following Rules cover the Civil Service. Equivalent versions of the Rules are in place for the Diplomatic Service/Intelligence Agencies/Armed Forces.

The Rules apply to civil servants who intend to take up an outside appointment or employment after leaving the Civil Service. The approval process for applications under the Rules differs depending on the applicant's seniority. The Rules continue to apply for two years after the last day of paid Civil Service employment.

### KEY PRINCIPLES

1. These Rules are designed to uphold the core values in the *Civil Service Code*:

#### **Integrity**

- *You must not misuse your official position, for example by using information acquired in the course of your official duties, to further your private interests or those of others.*

#### **Honesty**

- *You must not be influenced by improper pressures from others or the prospect of personal gain.*

#### **Objectivity**

- *You must take decisions on the merits of the case.*

#### **Impartiality**

- *You must not act in a way that unjustifiably favours or discriminates against particular individuals or interests.*

2. It is in the public interest that people with experience of public administration should be able to move into business or other bodies outside central Government, and that such movement should not be frustrated by unjustified public concern over a particular appointment. It is equally important that when a former civil servant takes up an outside appointment there should be no cause for justified public concern, criticism or misinterpretation.

### AIM

3. The aim of the Rules is to avoid any reasonable concerns that:
  - a) a civil servant might be influenced in carrying out his or her official duties by the hope or expectation of future employment with a particular firm or organisation, or in a specific sector; or
  - b) on leaving the Civil Service, a former civil servant might improperly exploit privileged access to contacts in Government or sensitive information; or
  - c) a particular firm or organisation might gain an improper advantage by employing someone who, in the course of their official duties, has had access to:

- i. information relating to unannounced or proposed developments in Government policy, knowledge of which may affect the prospective employer or any competitors; or
- ii. commercially valuable or sensitive information about any competitors.

## WHO MUST APPLY, WHEN AND HOW

4. The Rules apply to **all serving civil servants and to former civil servants for two years after the last day of paid service**. This includes:
  - o Permanent civil servants;
  - o Civil servants on fixed term contracts;
  - o Civil servants on secondment to other organisations;
  - o Those on secondment to the Civil Service from other organisations<sup>5</sup>; and
  - o Special advisers.
5. Before **accepting any new appointment or employment, whether in the UK or overseas, which they intend to take up after they have left the Civil Service**, all serving/former civil servants must consider whether an application under the Rules is required. If it is required, they should not accept a new job offer before it has been approved. The model application form for this purpose supplied by the Secretariat to the independent Advisory Committee on Business Appointments can be accessed at: <http://acoba.independent.gov.uk/media/21242/model-business-appointments-application-form-civil-servants.rtf>.

## WHEN APPROVAL IS REQUIRED

6. The process for giving approval differs depending on the applicant's seniority. The operation of these Rules is overseen by the independent Advisory Committee on Business Appointments (<http://acoba.independent.gov.uk>) who consider the most senior cases.

## SCS3 AND ABOVE

7. An application is required for any new appointment or employment that they wish to take up during the two year period after their last day of paid service. Applications from SCS3 and above must be referred by the Department to the Advisory Committee, who provide advice to the Prime Minister, who makes the final decision<sup>6</sup>.
8. Because of their role at the highest level of Government, and their access to a wide range of sensitive information, all Permanent Secretaries, including Second Permanent Secretaries, will be subject to a minimum waiting period of three months between leaving paid Civil Service employment and taking up an outside appointment or employment. The Advisory Committee may advise that this minimum waiting period should be waived if, in its judgement, no questions of propriety or public concern arise from the appointment or employment being taken up earlier. Equally, the Advisory Committee may consider that public concern about a particular appointment or employment could be of such a degree or character that a longer waiting period is appropriate. Taking account of the maximum

<sup>5</sup> Except when they are returning to their employing organisation, and remain there for two years, in which case safeguards will have been provided in the terms of secondment.

<sup>6</sup> Where applications are from civil servants who serve/formerly served in the Devolved Administrations in Scotland and Wales, the Advisory Committee will provide advice to the relevant First Minister, who will make the final decision.

waiting period of two years that may be applied, the Committee may, exceptionally, add a rider to their advice saying that they view the appointment or employment to be unsuitable.

9. As a general principle, there will be a two year ban on civil servants at SCS3 and above lobbying<sup>7</sup> Government on behalf of their new employer after they leave the Civil Service. The two-year lobbying ban may be reduced by the Advisory Committee if they consider this to be justified by the particular circumstances of an individual application.

## SCS2

10. An application is required for any new appointment or employment that they wish to take up during the two year period after their last day of paid service. Decisions on applications from SCS2 are made by the relevant Permanent Secretary. In all cases, the Permanent Secretary's written recommendation to the applicant setting out the decision on the case will be copied to the Advisory Committee's Secretariat at the same time.

## SCS1 and below

11. Applications from SCS1 level and below wishing to take up a new appointment or employment during the two year period after their last day of paid service are considered by the Department. An application is only required if the individual's circumstances match one or more of the following:
  - i. They have been involved in developing policy affecting their prospective employer, or have had access to unannounced Government policy or other privileged information affecting their prospective employer, at any time in their last two years in the Civil Service.
  - ii. They have been responsible for regulatory, or any other decisions, affecting their prospective employer, at any time in their last two years in the Civil Service.
  - iii. They have had any official dealings with their prospective employer at any time in their last two years in the Civil Service.
  - iv. They have had official dealings of a continued or repeated nature with their prospective employer at any time during their Civil Service career.
  - v. They have had access to commercially sensitive information of competitors of their prospective employer in the course of their official duties.
  - vi. The proposed appointment or employment would involve making representations to, or lobbying the Government on behalf of a new employer.
  - vii. The proposed appointment or employment is consultancy work, either self-employed or as a member of a firm, and they have had official dealings with outside bodies or organisations in their last two years in the Civil Service that are involved in their proposed area of consultancy work.

Departments' Human Resources functions will advise on whether or not an application is required.

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<sup>7</sup> Lobbying in this context means that the former civil servant should not engage in communication with Government (including Ministers, special advisers and officials) with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted.

## All Grades

12. Serving civil servants must report to their line manager any approach from an outside employer with an offer of an appointment or employment for which approval would be required under the Rules if they plan to follow up the offer. Staff engaged in the letting or management of Government contracts must report all offers of an appointment or employment immediately to their line manager whether or not they intend to follow them up.

## Special Advisers

13. Under the terms of their contract, special advisers are required to submit an application to the head of their former Department for any new appointment or employment they wish to take up during the two year period after their last day of paid service. In view of the particular nature of the special adviser role, applications from all special advisers, regardless of seniority, are referred to the Advisory Committee. The Advisory Committee provides advice to the relevant Permanent Secretary, who makes the final decision based on that advice.
14. Special advisers should report to the Permanent Secretary all offers of an appointment or employment received while they are employed as a special adviser.

## HOW TO APPLY FOR APPROVAL

15. Applicants must approach their Department's Human Resources function as early as possible. Human Resources will have a process in place for handling business appointment applications. This involves completing an application form which will need to be countersigned by an appropriate person, normally someone within the line management chain.
16. To ensure the quickest possible turn around, applications must be completed in as much detail as possible, with additional sheets or documents attached as necessary to answer the questions posed.
17. Notification of decisions on applications will be made through the Department.
18. Applications may be approved unconditionally, or approved subject to conditions applying for a maximum of two years from the individual's last day of paid service. Such conditions may include a waiting period and/or a prohibition on the individual being involved in lobbying<sup>8</sup> Government on behalf of their new employer. Other restrictions could include a condition that for a specified period, the former civil servant should stand aside from involvement in certain activities, for example, commercial dealings with his or her former Department, or involvement in particular areas of the new employer's business.
19. If any condition, including a waiting period, is imposed on the proposed appointment it will run from the last day of paid service. Consideration of the application may, where it is judged appropriate, take account of any differences between the last day of paid service and the last day in post. Approval will not normally be given to start a paid appointment or employment with a new employer before completion of the last day of paid service.
20. Where it is proposed that an application be approved with conditions or a waiting period, the applicant will be offered an opportunity to discuss any concerns he or she may have with an appropriate departmental officer, or for applicants at SCS3 level or above and special advisers, with the Advisory Committee, before a final decision is made.

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<sup>8</sup> Lobbying in this context means that the former civil servant should not engage in communication with Government (including Ministers, special advisers and officials) with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted.



21. For those cases considered by the Advisory Committee (applications from SCS3 and above and special advisers), in addition to the maximum two-year waiting period, the Advisory Committee may, if they judge the propriety concerns to be substantial, add a rider to their advice saying that they also view the appointment to be unsuitable. It is for the Prime Minister (or relevant Permanent Secretary in the case of special advisers) to take the final decision on the application based on the advice received from the Advisory Committee.
22. In addition to notifying the applicant of the outcome of their application, the Department must also inform prospective employers of any conditions which have been attached to the approval of the appointment or employment. For those applications considered by the Advisory Committee, their advice, alongside summary details of the applicant's last Civil Service post, will usually be made public once the appointment or employment has been taken up by the applicant or announced, and Departments have discretion to publicise their advice in the same way. In all other respects, the business appointment process is a confidential one<sup>9</sup>.

## WHERE TO FIND OUT MORE

23. Departmental guidance and advice on the Rules is available from local Human Resources functions, and, where applicable, on local intranets. More about the operation of the Rules, including details of appointments approved and taken up by the most senior members of the Civil Service, can be found on the website of the independent Advisory Committee on Business Appointments: (<http://acoba.independent.gov.uk>).
24. The Advisory Committee's Secretariat is available to provide advice and support to Departments on the application of the Business Appointment Rules and the handling of individual cases at any level. Contact details are:

Office of the Advisory Committee on Business Appointments  
1 Horse Guards Road  
London  
SW1A 2HQ  
Tel: 020 7271 0839  
Email: [acoba@acoba.gsi.gov.uk](mailto:acoba@acoba.gsi.gov.uk)

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<sup>9</sup> The Committee handles personal information provided to it in accordance with the Data Protection Act 1998. Such information may on limited occasions be published, for example, if the Committee is required to publish information in accordance with the Freedom of Information Act 2000.

# GUIDELINES FOR DEPARTMENTS ON ADMINISTERING THE BUSINESS APPOINTMENT RULES FOR CIVIL SERVANTS

## The Application

1. Departments should use the model application form supplied by the Secretariat to the independent Advisory Committee on Business Appointments which can be accessed at:  
<http://acoba.independent.gov.uk/media/21242/model-business-appointments-application-form-civil-servants.rtf>.
2. The countersigning officer should be someone in a position to understand the potential issues arising from the applicant's proposed outside appointment and judge the possible public perceptions should the appointment be taken up as proposed. This will normally be someone in the applicant's line management chain.
3. The relevant Permanent Secretary (or equivalent) is responsible for the effective operation of the Business Appointment Rules within their Department. Countersigned applications should be sent to Human Resources functions for departmental action. This should include scrutiny of the form to ensure that all the requested information has been completed by both the applicant and the countersigning officer, and that there is consistency in decision making across the Department.
4. Applications must be dealt with in the following manner:
  - SCS3 and above: All applications must be referred to the Advisory Committee who will give their advice to the Prime Minister who will make the final decision. The decision will be communicated to the Department as soon as practicable by the Advisory Committee's Secretariat.
  - SCS2: All applications should be dealt with by the relevant Permanent Secretary (or equivalent).
  - SCS1 and below: All applications should be dealt with by the Department.
  - Special advisers: All applications must be referred to the Advisory Committee, who will provide advice to the relevant Permanent Secretary (or equivalent), who will make the final decision.
  - The proposed decision on any application can be referred to the Advisory Committee's Secretariat for informal advice should the Department wish to do so.
  - An application at any level may be referred to the independent Advisory Committee if the Head of the Civil Service and/or the relevant Permanent Secretary (or equivalent) agree it is necessary to have independent advice.
5. Before sending any applications from SCS3 and above and applications from special advisers to the Advisory Committee's secretariat for submission to the Advisory Committee, Departments must make an initial assessment of the appointment, and take an initial view on what recommendation would be appropriate. This recommendation should accompany the completed application and any supporting documentation and should be sent to the address below:

Office of the Advisory Committee on Business Appointments  
1 Horse Guards Road  
London  
SW1A 2HQ  
Tel: 020 7271 0839  
Email: [acoba@acoba.gsi.gov.uk](mailto:acoba@acoba.gsi.gov.uk)
6. The Advisory Committee aims to provide its advice to the Prime Minister (or relevant Permanent Secretary in the case of applications from special advisers) within 20 working days of receipt of a fully completed

application from Departments. Complex cases may take longer, but in such cases, the Committee's Secretariat will advise the Department concerned.

7. Once the application process has been completed, the Department is responsible for making the decision on cases below SCS3.
8. For cases at SCS2, the Permanent Secretary's written recommendation to the applicant setting out the decision on the case must be copied to the Advisory Committee's Secretariat at the same time.
9. Where a Department recommends a waiting period, or conditions, the applicant should be given the opportunity to discuss the application with an appropriate departmental officer and make any representations to them before the final decision is reached. Those applicants dealt with by the Advisory Committee will normally be asked if they wish to meet with the Committee before any advice is offered to the Prime Minister (or relevant Permanent Secretary if the applicant is a special adviser).

### **Compliance Assurance**

10. Departments must manage the reputational and other risks associated with the movement of staff to other employers. Permanent Secretaries (and equivalents) are personally responsible to the Head of the Civil Service for the effective management of these risks, and the timely and appropriate handling of business appointment applications within their departments.
11. Permanent Secretaries (and equivalents) are required to send an annual confirmation of compliance to the Advisory Committee.
12. The Advisory Committee's Secretariat undertakes a programme of informal compliance checks of Departments' arrangements for handling business appointment applications.
13. Compliance checks will seek evidence of effective management of the Business Appointment Rules which should include the following:
  - a. Promoting Awareness: Departments should ensure that all staff have access to the Business Appointment Rules and be aware of their existence. To be enforceable, the Rules must be included in staff handbooks or equivalent documentation (for example, on departmental intranets).
  - b. Ensuring Consistency: Departments should put measures in place to ensure that the Rules are consistently applied within the organisation, and that they are broadly consistent with the Advisory Committee's approach.
  - c. Ensuring Fairness: Departments should deal with applications in line with their turnaround targets, and be open and honest with applicants about the handling of their applications.
  - d. Managing Leavers: Those leaving the department, for whatever reason, should have the Rules brought to their attention at the earliest opportunity. Care should also be taken when agreeing the terms of any career breaks as this can, on occasion, lead to someone leaving the Department on a permanent basis (for example, it would be difficult to set conditions on the appointment if the Department had already allowed it to be taken up during a career break which had subsequently been curtailed).
  - e. Managing Employment Contracts: Draft/model contracts of employment – for example, for fixed term appointees or members of the SCS – should make explicit reference to the Rules.
  - f. Protecting Third Parties: Where applicants have, at any time during their last two years in the Civil Service, had contractual dealings with any competitors of their prospective employer, or access to information concerning them which could be regarded as commercially sensitive, Departments should seek the views of the competitors about the proposed appointment as a matter of course.
  - g. Managing High Risk Areas: Departments should identify interchange trends and obvious areas of risk and ensure these are understood by senior management and monitored appropriately – for example, by ensuring that all secondees into the Civil Service are free from any conflict of interest, and that they are free to return to their parent employer without there being cause for concern on propriety grounds; and by

ensuring that all staff involved in procurement and their line management are aware of the requirement to report all job offers to their Departments; and by ensuring that relationships with suppliers and partner organisations remain on a proper footing.

h. Informing Parties of Decisions: In addition to advising the applicant of the final decision, the Department must also inform the prospective employer (and, if appropriate, their competitors) of any waiting periods or conditions imposed, as well as informing affected officials within Government – for example, an applicant's former colleagues will need to be aware if an appointment has been approved on the condition that the applicant does not personally engage in lobbying former colleagues on behalf of his or her new employer.

i. Managing Public Expectations: Whilst there is no requirement for Departments to publish their decisions on applications there may be occasions where a particular appointment attracts wider press or public attention. On these occasions, the Department will want to be able to explain their position quickly, and so should ideally structure their case management systems with this in mind – it is unlikely to instil public confidence in the system if Departments are unable to confirm the decisions they have or have not made.

14. In addition to making public their advice on applications referred to them, the Advisory Committee may also comment on their assessment of overall compliance with the Rules by Departments (and other bodies), in their Annual Report.
15. The Advisory Committee's Secretariat (contact details at paragraph 5 above) is available to provide advice and support to Departments on the application of the Business Appointment Rules and the handling of individual cases at any level.

## Recommendations on appointments taken up by former Crown servants

**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.

<b>Sir Alex Allan KCB</b> Former Permanent Secretary, Ministry of Justice	
Retired from Crown service	September 2011
<b>Member of the QC Appointments Selection Panel</b>	
Took up new appointment	March 2013
<p>Sir Alex applied for an advertised post as a lay member of the QC Appointments Selection Panel, which is responsible for assessing applications and interviewing individuals who wish to be appointed Queen's Counsel. It is a limited company and is independent of Government, the Bar Council and the Law Society. The role that he has been offered will take up 30-35 days a year, and he does not expect it to require any contact with Government.</p> <p>When considering the application the Committee noted that, while Sir Alex had had limited involvement in the setting up of the Panel in 2004, he had had no official dealings with his prospective employer during his last two years of service and that the Panel is independent of Government. It also noted that as he retired over a year ago, the three-month waiting period usually observed by Permanent Secretaries has expired. The Committee also received confirmation from the Cabinet Office that there is no conflict of interest between his new appointment and his position as the Prime Minister's Independent Adviser on Ministerial Interests.</p> <p><b>The Prime Minister accepted the recommendation of the Committee that, the three-month waiting period for Permanent Secretaries having expired, the application be approved subject to the condition that:</b></p> <p><b>- for two years from his last day of service, he should not become personally involved in lobbying Government on behalf of his new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	March 2013
<b>Dame Christine Beasley</b> Former Chief Nursing Officer, Department of Health	
Retired from Crown service	June 2012
<b>Chair of the Council of the University of Buckinghamshire</b>	
Took up new appointment	September 2012
<p>Dame Christine sought permission to accept an advertised post as the Chair of the Council of the University of Buckinghamshire. She will be responsible for ensuring that the Council exercises effective control over the strategic direction of the university, and that the performance of the University is adequately assessed against the objectives which the Council has approved.</p>	

<p>When considering the application, the Committee noted that Dame Christine had had no official dealings with her prospective employer or its competitors.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that:</b></p> <p><b>- for two years from her last day of service, she should not become personally involved in lobbying UK government on behalf of her new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	August 2012
<b>Non-executive Director, NHS Trust Development Authority</b>	
Took up new appointment	October 2012
<p>Dame Christine sought approval to accept non-executive directorship with the NHS Trust Development Authority, an 'Arm's Length Body' which was established as a special health authority in June 2012 to provide, from April 2013, governance and accountability for NHS trusts in England and delivery of the foundation trust pipeline.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that:</b></p> <p><b>- for two years from her last day of service, she should not become personally involved in lobbying UK government on behalf of her new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	August 2012
<b>Chair, Local Education and Training Board of North and East London</b>	
Took up new appointment	December 2012
<p>Dame Christine sought approval to accept a part-time appointment as Chair of the Local Education and Training Board (LETB) of North and East London. In 2012 Health Education England inherited responsibility for delivering education and training for the NHS. To support it in this work, each region will have its own LETB to take on education and training in their area from March 2013.</p> <p>The Committee noted that Dame Christine had had no official dealings with her prospective employer, which is a new body set up following the announcement in January 2012 of a new policy framework for education and training of the health workforce. It also noted that she had applied for an advertised post.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from her last day of service, she should not become personally involved in lobbying Government on behalf of her new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	November 2012
<p><b>Jeremy Beeton</b> Former Director General, Government Olympic Executive, Department for Culture, Media and Sport (DCMS)</p>	
Left Crown service	October 2012
<b>Member of Strathclyde University Court</b>	
Appointment announced	October 2012
<p>Mr Beeton sought permission in June 2012 to accept a part-time, unpaid appointment as a member of Strathclyde University Court, when he leaves the civil service in October 2012.</p> <p>The Committee noted that he had not been involved in any decisions that have affected Strathclyde University Court or any competitors; nor had he been involved in any other work affecting them.</p>	

<b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that:</b>	
<b>- for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b>	
<b>Date of approval</b> <b>Approval letter</b>	July 2012
<b>Member of Advisory Board, PricewaterhouseCoopers Services Ltd</b> <b>Adviser, Macquarie Infrastructure and Real Assets (Europe) Ltd</b>	
Took up appointments	PricewaterhouseCoopers - November 2012 Macquarie - December 2012
Mr Beeton sought permission in July 2012 to accept part-time appointments as a Member of the Advisory Board of PricewaterhouseCoopers, including providing indirect advice to the company's partners or clients, and as an adviser with Macquarie, Infrastructure and Real Assets (Europe) Ltd, following the expiry of his civil service contract on 31 October 2012.	
The Committee noted that Mr Beeton had not had any official dealings with his prospective employers or their competitors, and that he had not been involved in any decisions concerning them, or in any developing policy that could affect their business.	
<b>The Prime Minister accepted the Committee's recommendation that, on the basis that there was no change to the relevant circumstances of his applications before Mr Beeton left the civil service, his applications be approved subject to the conditions that:</b>	
<b>- for 12 months from his last day of service, he should not provide advice on any bid or contract directly relating to the work of the DCMS; and</b>	
<b>- for two years from the same date, he should not become personally involved in lobbying Government on behalf of his new employers, their partners or clients.</b>	
<b>Date of approval</b> <b>Approval letter</b>	July 2012
<b>David Behan</b> Former Director General - Social Care, Local Government and Care Partnerships, Department of Health	
Resigned from Crown service	July 2012
<b>Chief Executive, Care Quality Commission</b>	
New appointment announced	June 2012
Took up new appointment	July 2012
Mr Behan sought permission to accept a full-time post as Chief Executive of the Care Quality Commission (CQC), a non-departmental public body sponsored by the Department of Health that regulates all health and social care services in England.	
The Committee noted that, due to uncertainty as to whether Mr Behan would remain a civil servant when he took up his new post, the appointment was accepted and announced before its advice had been sought. However, it also noted that the CQC is an NDPB sponsored by the Department of Health and that, as a result, the usual concerns regarding former officials lobbying on behalf of their new employers do not apply here.	
<b>The Prime Minister accepted the Committee's recommendation that the application be approved unconditionally.</b>	
<b>Date of approval</b> <b>Approval letter</b>	August 2012
<b>Duncan Brack</b> Former Special Adviser to the Secretary of State, Department for Energy and Climate Change	
Resigned from Crown service	February 2012
<b>Independent consultant</b>	

Took up new appointment	May 2012
<p>Mr Brack sought permission to set up as an independent consultant providing policy research and analysis on aspects of international environmental policy; writing and editing on current political issues and political history; and providing policy research and advice on aspects of UK government and environmental policy.</p> <p>When considering the application, the Committee noted that Mr Brack had previously had dealings with some of the organisations he listed as possible clients but it recognised that they were not of a contractual nature, that he had contacts with these organisations prior to becoming Special Advisor and that the majority of his work will not be strongly related to his experience at DECC.</p> <p><b>The Permanent Secretary accepted the committee's recommendation that the application be approved on the following terms:</b></p> <ul style="list-style-type: none"> <li>- for six months from his last day of service he should submit a fresh application for any commission he wishes to accept with companies in policy areas within his remit at DECC (Climate policy (UK, EU and international), nuclear, gas, carbon capture and storage, biomass and biofuels, Green Investment Bank, energy-intensive industries and environmental taxation);</li> <li>- for 12 months from the same date, he should not undertake any work which involves providing advice to any company or organisation on the terms of any bid or contract relating to the work of DECC;</li> <li>- that, for 2 years from the same date, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of any of his clients; and</li> <li>- once he has received approval to set up as an independent consultant, he must, for two years from his last day of service, 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.</li> </ul> <p>As with all Special Advisers, the Committee makes this recommendation on the understanding that, if he has not already done so, Mr Brack will be required to confirm in writing to DECC that he recognises that he will continue to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information, and by his duty of confidentiality owed to the Crown.</p> <p>The Committee noted with concern that Mr Brack had accepted commissions with Chatham House, Westminster Explained, Maitland Communications and WWF before receiving approval for his independent consultancy, yet it finds these commissions permissible under the terms of his consultancy as set out above.</p> <p><i>Commissions</i> November/December 2012 - WWF, Global Witness, Forest Trends, Chatham House/Forest Trends, the Children's Investment Fund Foundation, Understanding Modern/Gov</p>	
<b>Date of approval</b> <b>Approval letter</b>	June 2012
<p><b>Sir Alasdair Breckenridge CBE FRSE</b> Former Chairman of the Medicines and Healthcare Products Regulatory</p>	
Left Crown Service	December 2012
<b>Non Executive Director, UCL Hospital Foundation Trust</b>	
Took up new appointment	November 2012
<p>Sir Alasdair sought advice about accepting a part-time appointment as a Non Executive Director with UCL Hospital NHS Foundation Trust. The Trust is one of the largest in the UK, made up of seven London hospitals (University College Hospital, the Royal National Throat, Nose and Ear Hospital, the Royal London Hospital for Integrated Medicine, the Hospital for Tropical Diseases, the National Hospital for</p>	



Neurology and Neurosurgery, the Heart Hospital and the Eastman Dental Hospital). His role will include providing advice on the strategic management of the Trust.

When considering the application, the Committee took into account that Sir Alasdair was not a Permanent Secretary equivalent, he is not subject to a three-month waiting period, and as his proposed appointment raises no concerns in terms of it being a reward or of him having had access to commercially sensitive information or future policy, there would be no difficulty in him taking up the post as he intends immediately after he leaves Crown service.

**The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying Government on behalf of his new employer.**

<b>Date of approval</b> <b>Approval Letter</b>	October 2012
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**Robert Brinkley CMG**  
Former High Commissioner to Islamabad

Left the Diplomatic Service	November 2011
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**Independent consultant**

Took up new appointment	July 2012
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Mr Brinkley sought permission to set up as an independent consultant, building a London-based portfolio of advisory and non-executive positions, offering strategic advice on international political issues, political risk assessment and a senior interface for dealings with governments and other organisations. Under this consultancy he wished to take up a commission with Associated British Foods plc (ABF). He had been on secondment to ABF from March 2010 until September 2011.

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

**- for 12 months from his last day of service he should not undertake any work which involves providing advice on the terms of any bid or contract relating to the work of the FCO; and**

**- for two years from the same date, he should not become personally involved in lobbying the UK Government on behalf of any of his clients.**

**His commission with ABF was approved subject to a waiting period of six months from the date on which his secondment to the company ended in addition to the conditions set out above.**

<b>Date of approval</b> <b>Approval letter</b>	April 2012
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**Air Chief Marshal Sir Simon Bryant KCB CBE**  
Former Commander-in-Chief Air Command

Retired from the RAF	May 2012
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**Programme Director, BAE Systems**

Took up new appointment	September 2012
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Sir Simon sought permission to take up a full-time appointment as a Programme Director with BAE Systems, with responsibility for delivering the company's military aircraft export programme on the Arabian Peninsula.

Having received detailed advice from the MOD, the Committee noted that Sir Simon had had no commercial dealings with BAE Systems or other companies, and any contact he had had with the company was limited to ensuring that it has a clear view of Air Command's priorities. It also noted that his proposed role would be solely Middle East facing with no responsibility for UK sales.

<p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to:</b></p> <ul style="list-style-type: none"> <li>- a waiting period of three months from his last day of service, and;</li> <li>- for two years from the same date, he should not become personally involved in lobbying UK Government on behalf of his new employer.</li> </ul>	
<p><b>Date of approval</b> <b>Approval letter</b></p>	<p>May 2012</p>
<p><b>Philippa Buckley</b> Former Special Adviser to the Secretary of State for the Department of International Development</p>	
<p>Left from Crown Service</p>	<p>October 2012</p>
<p><b>Consultant - Malachite Advisors Ltd</b></p>	
<p>Took up new appointment</p>	<p>January 2013</p>
<p>Ms Phillipa Buckley sought permission to set up as an independent consultant in order to undertake a one-off commission with Malachite Advisors Ltd. Malachite Advisors Ltd is a London based strategic advisory firm that advises multinational organisations on their investments and presence in emerging markets.</p> <p>When considering this application, the Committee took into account that Ms Buckley will be working in a team of four, contributing to Malachite's six week project on behalf of a large oil and gas client by conducting desk based research into the political, social and business operating environment in Morocco. The Committee also noted that, whilst she might need to contact and/or meet third parties to seek their views and advice, this commission is not likely to involve representing Malachite's or its client's interests to the Government. The Committee took into account the fact that your Department has no relationship with Malachite Advisors Ltd. In addition, the Committee took into account the fact that, during her last two years of service, Ms Buckley has not: had any contractual dealings with her prospective employer; had access to any commercially sensitive information about any of her prospective employer's competitors; or been involved in the development or administration of any policy or decisions (including the award of grants) that could have affected her prospective employer or its competitors.</p> <p><b>The Permanent Secretary of DFID accepted the committee's recommendation that the application be approved on the condition that, for the duration of her contract with Malachite Advisors Ltd, Ms Buckley should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of her new employer, its parent company or its clients.</b></p>	
<p>Date of Approval <b>Approval Letter</b></p>	<p>January 2013</p>
<p><b>Junior Project Developer, EleQtra</b></p>	
<p>Took up new appointment</p>	<p>February 2013</p>
<p>Ms Phillipa Buckley sought permission to accept a full-time paid appointment with EleQtra. EleQtra (Infraco) Ltd specialises in infrastructure development, managing private and public sector funds to create investment opportunities in infrastructure (such as power, transport and water) in developing countries.</p> <p>When considering the application, the Committee took into account the that, during her last two years of service, Ms Buckley has not: had any contractual dealings with her prospective employer; had access to any commercially sensitive information about any of her prospective employer's competitors; or been involved in the development or administration of any policy or decisions (including the award of grants) that could have affected her prospective employer or its competitors.</p> <p>The Committee also noted that Ms Buckley has confirmed that this appointment might involve contact and/or dealings with her former Department and/or Government more generally. However, if any contact occurs, it would be with officials in DFID's country offices where Ms Buckley would be</p>	

developing a project. The Committee noted that Ms Buckley will not lobby DFID Ministers, officials or special advisers, the aim of any contact being to ensure that in-country officials along with other international donors present in the country were aware of the aims and progress of the project she will be developing.

**The Permanent Secretary of DFID accepted the committee's recommendations that the application be approved subject to the following conditions:**

**- that for 12 months from her last day of service, she should not undertake any duties that involve advising on the terms of any bid or contract relating to DFID or have contact with senior officials in DFID in relation to any bids or contracts on behalf of her new employer, its parent company or its clients; and**

**- that for two years from her last day of service she should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of her new employer, its parent company or its clients.**

<b>Date of approval</b>	January 2013
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**Sir Andrew Cahn KCMG**  
Former Chief Executive of UKTI

Retired from Crown service	January 2011
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**Non-executive director, General Dynamics**

Took up new appointment	May 2012
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Sir Andrew sought permission to accept a non-executive directorship with defence contractor General Dynamics UK.

When considering the application the Committee noted that Sir Andrew retired from the Civil Service 15 months ago and that he had had no contractual dealings with General Dynamics whilst in post.

**The Prime Minister accepted the recommendation of the Committee that the application be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK government on behalf of his new employer.**

<b>Date of approval</b> <b>Approval letter</b>	May 2012
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**Simon Cawte**  
Former Special Adviser, Department of the Environment, Food and Rural Affairs

Left Crown service	September 2012
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**Communications Manager, Battersea Power Station Development Company Ltd**

Appointment taken up	October 2012
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Mr Cawte sought permission to accept a full-time appointment as Communications Manager of Battersea Power Station Development Company Ltd.

The Committee noted that Mr Cawte had had no official dealings with Battersea Power Station Development Company whilst a Special Adviser, that he had had no access to any commercially sensitive information or departmental knowledge which could provide his prospective new employer with an unfair advantage, and that he had not been involved in any decisions affecting its business. The Committee also noted that Mr Cawte's proposed role as Communications Manager was not concerned with lobbying or seeking to influence Government policy, but would involve informing stakeholders of progress on the development of the Battersea Power Station site.

**The Permanent Secretary accepted the Committee's advice that the application be approved subject to the condition that, for two years from his last day of service, Mr Cawte should not become personally involved in lobbying Government on behalf of his new employer.**

<b>Date of approval</b> <b>Approval letter</b>	October 2012
<b>Sir Suma Chakrabarti KCB</b> Former Permanent Secretary, Ministry of Justice	
Resigned from Crown service	July 2012
<b>President, European Bank for Reconstruction and Development (ERDB)</b>	
New appointment announced Took up new appointment	May 2012 July 2012
<p>The ERDB was established in 1991 to help countries in the region stretching from central Europe, across the Balkans and into central Asia to become open, market economies by providing project financing for banks, industries and businesses. It is owned by 63 countries, the European Union and the European Investment Bank. Sir Suma was nominated by the Chancellor of the Exchequer to be the UK's candidate for the post of President of the Bank and was subsequently elected by its shareholders in May 2012.</p> <p>The Committee noted with concern that the appointment had been announced before it could provide its advice on it. However, it also noted that Sir Suma had had no official contact with the ERDB as Permanent Secretary of the Ministry of Justice and that he had had only limited contact while he was Permanent Secretary of DFID over four years ago, and that he had been nominated by the Chancellor of the Exchequer and elected by the shareholders. Having received assurances that the public interest was best served by Sir Suma being able to take up the role immediately, the Committee judged that no questions of propriety or public concern arose from the appointment and that therefore the standard three-month waiting period observed by former Permanent Secretaries could be waived.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the condition that:</b></p> <p><b>- for two years from his last day of service, Sir Suma should not become personally involved in lobbying Ministry of Justice Ministers or officials, including Special Advisers, on behalf of his new employer, the usual three-month waiting period imposed on Permanent Secretaries being waived.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	July 2012
<b>John Collington</b> Government Chief Procurement Officer, Cabinet Office	
Resigns from Crown service	July 2012
<b>Chief Operating Officer, Alexander Mann Solutions</b>	
New appointment announced Took up new appointment	July 2012 July 2012
<p>Mr Collington sought permission to accept a full-time post as Chief Operating Officer of recruitment services firm Alexander Mann Solutions.</p> <p>When considering the application the Committee noted that Mr Collington's new role will focus on the management of AMS' delivery centres and improving efficiency rather than directly engaging with clients or potential clients, and he has stated clearly that he will not be involved in bidding for Government work. It also noted that he has had no official dealings with AMS.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the conditions that:</b></p> <p><b>- for 12 months from his last day of service, he should not become involved in advising on bids or contracts for Government business; and</b></p> <p><b>- for 2 years from the same date he should not become personally involved in lobbying Government on behalf of his new employer or its clients.</b></p>	

<b>Date of approval</b> <a href="#">Approval letter</a>	July 2012
<b>Lieutenant General Sir Gary Coward KBE CB</b> Former Commander (Land), Defence Equipment and Support, Ministry of Defence	
Retired from the Army	October 2012
<b>Non-executive Director, Redline Aviation Security Ltd</b>	
Took up new appointment	February 2013
<p>Lt Gen Coward sought permission to accept a part-time paid appointment as a non-executive director of Redline Aviation Security Ltd who provide security assessments, audits, training and management support for aviation industry clients. It also undertakes work with two partner companies: Citadel International Security Services Ltd and Robson Handling Technology Ltd.</p> <p>When considering the application, the Committee noted that the company lists the MOD as a client. However, the Committee noted that Lt Gen Coward had no official dealings with his prospective employer or its competitors during his last two years of service. Furthermore, he was not involved in any MOD decisions that might affect the business of the proposed employer.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the conditions that:</b></p> <ul style="list-style-type: none"> <li>- for 12 months from his last day of service, Lt Gen Coward should not provide advice to his new employer, its partners or clients on any bid or contract directly related to the work of the MOD, and:</li> <li>- for two years from the same date, he should not become personally involved in lobbying UK Government on behalf of his new employer, its partners or clients.</li> </ul>	
<b>Date of approval</b> <a href="#">Approval letter</a>	December 2012
<b>Patrick Crawford</b> Chief Executive, Export Credits Guarantee Department	
Resigned from Crown service	November 2012
<b>Chief Executive, Charity Bank</b>	
New appointment announced New appointment taken up	October 2012 November 2012
<p>Mr Crawford sought permission to accept a full-time post as Chief Executive of Charity Bank, which was founded in 2002 by the Charities Aid Foundation to provide loans and guarantees to small charities, social enterprises and community organisations.</p> <p>When considering the application, the Committee noted that Mr Crawford had had no official dealings with Charity Bank or access to any commercially sensitive information that would affect his application. It also noted his undertaking that in his new post he would have no involvement with the Export Credit Guarantee Department, UK Trade and Investment, or Crossrail Limited, or with any UK company in relation to exporting or investing overseas or with any UK export-related activities.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying Government on behalf of his new employer or its investors.</b></p>	
<b>Date of approval</b> <a href="#">Approval letter</a>	July 2012
<b>Martin Dinham</b>	

<b>Former Director General International Department, Department for International Development</b>	
Retired from Crown service	July 2010
<b>Chair of the Board, The Global Fund</b>	
Took up appointment	May 2011
<p>Mr Dinham sought permission to accept an appointment as the Chair of the Global Fund Board. The Global Fund provides funding for the treatment and prevention of AIDS, TB and malaria in developing countries.</p> <p>The Committee noted that the appointment had been accepted before approval of it had been sought. However, it advised the Prime Minister that, had an application been made at the appropriate time, it would have recommended that it be approved unconditionally.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved retrospectively, unconditionally.</b></p>	
<b>Date of approval</b>	June 2012
<b>Jim Easton</b>	
<b>Former National Director of Improvement and Efficiency, Department of Health</b>	
Resigned from Crown service	November 2012
<b>Managing Director for Health, Care UK</b>	
New appointment announced	November 2012
<p>Mr Easton sought permission to accept a full-time appointment as Care UK's Managing Director for Health. Care UK is one of the UK's largest independent healthcare providers working in partnership with the NHS to deliver more than fifty services across the country.</p> <p>When considering the application the Committee set aside any potential issues arising from Mr Easton's position on the NHS Commissioning Board as these are not for the Committee to address, and considered the proposed appointment from the perspective of a Department of Health SCS 3 civil servant moving to a healthcare provider.</p> <p>When considering the application the Committee noted that Mr Easton has been leading on efficiency and transformation of healthcare service, including looking at ways in which the outsourcing of service provision can contribute to this process, and that he will have gained considerable insight into Government policy in this area. Therefore there is the risk that any healthcare provider who wished to employ him could be thought, however incorrectly, to be gaining an unfair advantage by doing so. It could also be thought that he was being 'rewarded' by such an organisation for influencing policy on outsourcing in a way in which benefitted them in the widest sense. The Committee was of the view that the most effective way to address these issues was by ensuring that there was a clear gap between Mr Easton leaving the Department of Health and joining Care UK. Given his lack of any direct, contractual involvement with the company, and the fact that the reorganisation of the Department of Health will mean that many of its functions will soon transfer to other organisations, it felt that a gap of three months would be sufficient.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to:</b></p> <ul style="list-style-type: none"> <li><b>- a waiting period of three months from his last day of service;</b></li> <li><b>- the condition that, for 12 months from the same date, he should not become involved in advising on bids or contracts for Department of Health business; and</b></li> <li><b>- that, for two years from the same date, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b></li> </ul>	

<b>Date of approval</b> <b>Approval letter</b>	November 2012
<b>Sir John Elvidge KCB</b> Former Permanent Secretary, Scottish Government	
Retired from Crown service	June 2010
<b>Chairman of Edinburgh Airport Board</b>	
Appointment announced Appointment taken up	May 2012 June 2012
<p>Sir John sought permission to accept a part-time appointment as Chairman of the Edinburgh Airport Board. he was offered the position by Global Infrastructure Management LLC, part of Global Infrastructure Partners, which bought the airport in April 2012.</p> <p>The Committee noted that the appointment had been announced before approval of it could be granted but in view of the time that had elapsed since Sir John left the Scottish Government, it saw no difficulty with him taking it up in June.</p> <p><b>The First Minister accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from his last day of service, Sir John should not become personally involved in lobbying UK Government Ministers or officials, including Special Advisers, on behalf of his new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	May 2012
<b>Sir Jonathan Evans KCB</b> Director General, Security Service	
Retired from Crown service	April 2013
<b>Non-Executive Director, HSBC Holdings plc</b>	
Appointment announced	May 2013
<p>Sir Jonathan sought approval to accept a part-time paid appointment with HSBC Holdings as a non-executive director and Chair of its Board Committee on Financial System Vulnerabilities.</p> <p><b>The Prime Minister has accepted the Committee's recommendation that his application be approved subject to:</b></p> <ul style="list-style-type: none"> <li>- the usual waiting period of three-months from his last day of service observed by Permanent Secretaries and their equivalents, and to the condition that;</li> <li>- for two years from the same date, he should not become personally involved in lobbying Government on behalf of his new employer or its clients.</li> </ul>	
<b>Date of approval</b> <b>Approval letter</b>	March 2013
<b>Mike Falvey</b> Chief People Officer, HM Revenue & Customs	
Resigned from Crown Service	April 2013
<b>Corporate Services Director, Four Seasons Healthcare</b>	
Appointment announced Appointment to be taken up	February 2013 May 2013
<p>Mr Falvey sought permission to accept a full-time paid appointment as a Corporate Service Director with the Four Seasons Health Care (FSHC). FSHC is the UK's largest independent health and social care provider. Its parent company is Terra Firma. FSHC operates 445 care homes with 22,364 beds and 61</p>	

specialist care centres with 1,601 beds in England, Scotland, Wales, Northern Ireland, Jersey and the Isle of Man. It employs more than 30,000 staff caring for more than 20,000 residents. Mr Falvey has been offered a full-time paid appointment as Corporate Services Director. His responsibilities will include: strategy; communications; marketing/public relations; human resources; information technology and stakeholder relations.

When considering this application, the Committee noted there will be no contact and/or dealings with his former Department. The Committee took into account that FSHC does from time to time have dealings/contact with the Department of Health and the NHS; however, these meetings are at a strategic level and are led by the Chief Executive and the Non-Executive Chairman. The Committee took into account that there is a possibility that, with his responsibility for stakeholder relations, the Corporate Services Director might be called upon (on occasion) to support the ongoing relationship. The Committee noted that Mr Falvey did not have official or contractual dealings and has not been responsible for people who have had contractual dealings with his prospective 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 Prime Minister has accepted the Committee's recommendation that this application be approved subject to the condition that, for two years from his last day of service, Mr Falvey should not:**

- draw on any privileged information available to him whilst in Crown service; and
- become personally involved in lobbying Government on behalf of his new employer, its parent company or its clients.

<b>Date of approval Approval letter</b>	March 2013
<b>Dame Helen Ghosh DBE</b> Permanent Secretary, Home Office	
Leaves Crown service	September 2012
<b>Director General of the National Trust</b>	
Appointment announced August 2012, to be taken up in November 2012	
<p>Dame Helen sought permission to accept a full-time appointment as the Director General of the National Trust.</p> <p>The Committee noted that she had applied for an advertised post, and that there was no connection between the work of the charity and the Home Office. It also noted that she had been asked - in the public interest - to stay as Permanent Secretary until the end of September by the Head of the Civil Service to see through, and follow up on, security issues relating to the Olympics and Paralympics.</p> <p><b>The Prime Minister accepted the Committee's recommendation that her application to take up the new post in November 2012 be approved subject to the condition that, for two years from her last day of service, she should not become personally involved in lobbying Government on behalf of her new employer; the automatic three-month waiting period applicable to Permanent Secretaries being waived.</b></p>	
<b>Date of approval Approval letter</b>	August 2012
<b>Sir Richard Gozney KCMG CVO</b> Former HM Governor to Bermuda	
Retired from Crown service	July 2011
<b>Independent Non-Executive Board Memeber, Bumi plc</b>	
Took up appointment	February 2013



Sir Richard sought permission to accept a part-time, paid appointment as an independent non-executive board member with Bumi plc. Bumi plc is a FTSE listed thermal coal group with interests in the largest coal producing assets in Indonesia (the world's largest seaborne coal exporting nation). Bumi's main activity is to explore, mine and process coal and other minerals.

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, he should not become personally involved in lobbying UK Government on behalf of his new employer.**

<b>Date of approval</b> <b>Approval letter</b>	February 2013
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**Joseph Harley**  
Former Chief Information Officer, Department for Work and Pensions

Retired from Crown service	March 2012
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**Part-time advisory appointment, Amor Group**

Took up appointment	June 2012
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Mr Harley sought approval to accept a part-time advisory appointment with Amor Group.

When considering the application, the Committee noted that at no time had he had any official dealings with Amor Group and that, within the last two years of his service, he had had no official dealings with its competitors and no access to any commercially sensitive information concerning them.

**The Prime Minister accepted the Committee's recommendation that, on the basis that Mr Harley would not draw on any privileged information available to him as a civil servant, his application be approved subject to the conditions that:**

**- for 12 months from his last day of service, he should not provide advice to his new employer on any bid or contract directly relating to the work of any UK Government Department, and, for two years from the same date, he should not become personally involved in lobbying Government on behalf of his new employer.**

<b>Date of approval</b> <b>Approval letter</b>	May 2012
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**Dave Hartnett CB**  
Former Permanent Secretary for Tax, HM Revenue & Customs

Retired from Crown service	July 2012
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**Adviser, Board Committee on Financial System Vulnerabilities, HSBC Holdings plc**

New appointment announced	January 2013
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Mr Hartnett sought permission to accept a part-time appointment as an adviser to HSBC Holding's new Board Committee on Financial Systems Vulnerabilities. The Committee will provide governance, oversight and policy guidance over HSBC's framework of controls and procedures designed to identify areas where HSBC may expose itself and through its own exposure, the financial system more broadly, to financial crime or system abuse. Mr Hartnett is one of a small number of subject matter experts who have been appointed to the Committee.

When considering the application, the Committee noted that, whilst working in Government, Mr Hartnett had official dealings with HSBC over a number of years, but that these contacts were no more significant than the contacts he had with other banks operating in the UK. Furthermore, it noted that the appointment will not involve any consideration of UK tax liabilities or affairs (or any involvement with HMRC); the Board Committee's remit is aimed at preventing financial crime and other abuses of the financial system; and that Mr Hartnett would not have a role in the day-to-day management of HSBC's affairs - he would not be an executive or non-executive director of the bank. It also noted that he has already served the three-month waiting period which is required of former Permanent Secretaries.

<b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that:</b>	
- for two years from his last day of service, Mr Hartnett should not become personally involved in lobbying Government on behalf of his new employer.	
<b>Date of approval Approval letter</b>	January 2013
<b>Deloitte</b>	
New Appointment announced	May 2013
<p>Mr Hartnett sought permission to accept a part-time role with Deloitte, which will involve providing advice to overseas tax administrations and governments.</p> <p>When considering the application the Committee noted that Mr Hartnett's appointment with Deloitte would involve supporting the development of tax administrations in other countries. It was also noted that whilst working in Government, Mr Hartnett did have official dealings with Deloitte, and that he also dealt with a wide range of major accountancy and law firms during his time in HMRC and the Inland Revenue before that.</p> <p><b>The Prime Minister has accepted the Committee's recommendation that the application be approved subject to the conditions that he:</b></p> <ul style="list-style-type: none"> <li>- should not draw on any privileged information available to him whilst in Crown service;</li> <li>- has no involvement in either a representative or advisory capacity for any taxpayer that he has been involved with whilst at HMRC;</li> <li>- is not involved whilst engaged by Deloitte in any work considering how UK taxation, for any of their clients, can be mitigated or avoided;</li> <li>- has no involvement in negotiation or management of contracts with HMRC;</li> <li>- has no involvement in discussions with other fiscal authorities of UK's confidential tax policy where he has been involved in that area of work in HMRC; and</li> <li>- does not become personally involved in lobbying Government on behalf of his new employer for two years from his last day of service.</li> </ul>	
<b>Date of approval Approval letter</b>	March 2013
<b>David Hass</b> Former Special Adviser to the Secretary of State, Ministry of Justice	
Left Crown service	September 2012
<b>Head of Media, Hacked Off</b>	
Took up appointment	November 2012
<p>Mr Hass sought permission to accept a full-time appointment as the Head of Media with the Hacked Off campaign.</p> <p>The Committee noted that Mr Hass had had no dealings with Hacked Off whilst a Special Adviser; that information he had discussed with the Secretary of State which may have been of interest to his prospective employer was now in the public domain; and that there is no direct link between Hacked Off and the Ministry of Justice.</p> <p><b>The Permanent Secretary accepted the Committee's recommendation that, on the basis that Mr Hass would not draw on any privileged information available to him whilst a Special Adviser, the application be approved subject to the condition that, for the six-month duration of his contract, he should not become personally involved in lobbying UK</b></p>	

<b>Government on behalf of his new employer.</b>	
<b>Date of approval Approval letter</b>	November 2012
<b>Hilary Jackson CB</b> Former Head of the Northern Ireland Office	
Retired from Crown service	31 December 2011
<b>Member of the Board of Trustees of Crime Reduction Initiatives</b>	
Took up appointment	June 2012
<p>Ms Jackson sought approval to accept a part-time, unpaid appointment as a member of the Board of Trustees of Crime Reduction Initiatives (CRI).</p> <p>The Committee noted that she had been on loan to the Northern Ireland Office from the Ministry of Justice since 2005, and that CRI does not operate in Northern Ireland; that she had had no official dealings with the charity; and that she is unlikely to seek to have any direct dealings with Government in her new post. Nevertheless, the Committee considered that it was proper that the normal restriction on lobbying provided by the Rules should apply.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the condition that:</b></p> <p><b>- for two years from her last day of service, she should not become personally involved in lobbying Government on behalf of her new employer.</b></p>	
<b>Date of approval Approval letter</b>	June 2012
<b>Jenny Jackson</b> Former Special Adviser to the Secretary of State, Department of Health	
Left Crown service	30 March 2012
<b>Interim Director of Global Development, UCL Partners</b>	
Took up new appointment	April 2012
<p>Ms Jackson sought approval to accept a temporary, full-time post as Interim Director of Global Development at UCL Partners, one of five accredited academic health systems in the UK, which describes itself as working with a range of stakeholders to translate cutting edge research and innovation into measurable health gains for patients.</p> <p>The Committee noted that her new role would be overseas-focused rather than UK policy facing and that it was temporary in nature. She had also had no involvement in policy development and her official post did not cover academic health science, the field in which her new employer operates.</p> <p><b>The Permanent Secretary of the Department of Health accepted the Committee's recommendation that the appointment, noting that it is a three-month contract, be approved subject to the condition that, for two years from her last day of service, she should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of her new employer.</b></p> <p>As with all Special Advisers, the Committee made its recommendation on the understanding that, if she had already done so, Ms Jackson would be required to confirm in writing to the department that she recognises she will continue to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information and by her duty of confidentiality owed to the Crown.</p>	
<b>Date of approval Approval letter</b>	April 2012

<b>Christine Jardine</b> Former Special Adviser, No. 10	
Resigned from Crown service	June 2012
<b>Supporting communications operations in the constituency offices of Danny Alexander MP and John Thurso MP, and undertaking work as a media commentator</b>	
Appointments taken up	Constituency Office of Danny Alexander, taken up September 2012 Constituency Office of John Thurso, taken up October 2012 Media work for BBC Scotland undertaken in September 2012
<p>Ms Jardine sought permission to accept part-time roles supporting the communication operation in Danny Alexander's constituency office and as a constituency organiser for John Thurso. She also sought permission to accept work as an independent media commentator.</p> <p>The Committee noted that Ms Jardine's role as a special adviser in No. 10 involved providing advice on the media and issues concerning Scotland. It noted that the constituency roles were offered following her decision to resign to spend more time in Scotland, and that her proposed new employment as a media commentator would mainly be focused on Scottish politics. In reaching its decision, the Committee noted that, in her official role, Ms Jardine had no access to information that would give her an unfair advantage and that no lobbying of any government department was anticipated.</p> <p><b>The Permanent Secretary accepted the Committee's recommendation that, on the basis that Ms Jardine would not draw on any privileged information available to her as a special adviser, her application be approved subject to the condition that:</b></p> <p><b>- for 12 months from her last day of service, she should not become personally involved in lobbying Government on behalf of any of her new employers.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	September 2012
<b>Joel Kenrick</b> Former Special Adviser to the Secretary of State, Department for Energy and Climate Change	
Resigned from Crown service	February 2012
<b>Independent consultant</b>	
Took up new appointment	March 2012
<p>Mr Kenrick sought permission to set up as an independent consultant advising clients on energy and climate change policy, and communications. His initial commission is with Adam Smith International in Nigeria working on a climate change and governance project being carried out with the Nigeria Infrastructure Advisory Facility.</p> <p><b>The Permanent Secretary accepted the Committee's recommendation that the application be approved subject to the conditions that:</b></p> <p><b>- for six months from his last day of service he should submit a fresh application for any commission he wishes to accept with companies in the energy sector;</b></p> <p><b>- for twelve months from the same date he should not undertake any work which involves providing advice to any company or organisation on the terms of any bid or contract relating to the work of DECC;</b></p> <p><b>- for two years from the same date, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special advisers, on behalf of his clients.</b></p> <p><b>In addition, 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</b></p>	

**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.**

As with all Special Advisers, the Committee made this recommendation on the understanding that, if he had not already done so, Mr Kenrick, will be required to confirm in writing to DECC that he recognises that he will continue to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information, and by his duty of confidentiality owed to the Crown.

*Commissions*

March 2012 - Adam Smith International/Nigeria Infrastructure Advisory Facility

June 2012 - Greenpeace.

<b>Date of approval</b>	March 2012
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**Interim Head of Public Affairs, WWF-UK**

Took up new appointment	September 2012
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Mr Kenrick sought approval to take up a full-time post as Interim Head of Public Affairs for WWF-UK (formerly known as the World Wildlife Fund). While WWF-UK is best known for its conservation work, it also campaigns on climate change and sustainability issues. Part of the responsibilities of the post will be to increase the organisation's influence and profile in Westminster, Whitehall, Brussels and the UK's devolved administrations.

The Committee noted that, given the nature of his responsibilities, a 'blanket' restriction on lobbying would prevent him from carrying out his new role.

**The Permanent Secretary accepted the Committee's recommendation that the application be approved subject to the condition that:**

**- for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer but that, in this case, the condition would not be intended to prevent him from communicating with Government in the normal course of business.**

As with all Special Advisers, the Committee made this recommendation on the understanding that, if he had not already done so, Mr Kenrick, will be required to confirm in writing to DECC that he recognises that he will continue to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information, and by his duty of confidentiality owed to the Crown.

<b>Date of approval</b>	September 2012
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**Jitinder Kohli**

Former Director General Strategy and Communications, Department for Business, Innovation and Skills

Resigned from Crown service	July 2012
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**Director, Federal Government Practice, Deloitte Consulting**

Takes up new appointment	July 2012
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Mr Kohli sought permission to accept a full-time appointment as a Director of Deloitte Consulting's Federal Government Practice based in New York. He will work on strategy projects largely for clients in the US Government, with a special focus on work with developing countries, organisational performance, reorganisation, budgeting and innovation in government agencies.

When considering the application, the Committee noted that Mr Kohli had been on sabbatical from the Civil Service since November 2009, during which time he had been working as a Senior Fellow at the Center for American Progress in Washington. It also noted that he had dealings with Deloitte whilst at the Better Regulation Executive and that his new role will focus on strategy projects with for clients in the US Government, particularly on work with developing countries.

<b>The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b>	
<b>Date of approval</b> <b>Approval letter</b>	June 2012
<b>Vice Admiral Sir Paul Lambert KCB</b> Former Director, Equipment Capability, Ministry of Defence	
Retired from the Royal Navy	April 2012
<b>Secretary General, The Order of St John</b>	
Took up new appointment	February 2013
<p>Sir Paul sought permission to accept a full-time paid post as Secretary General of The Order of St John, the international charity which provides first aid, health care and support services worldwide.</p> <p>When considering this application, the Committee noted that Sir Paul had no previous involvement with his prospective employer or its competitors. The Committee also noted that MOD has no relationship with the Order of St John and that his proposed responsibilities are removed from his MOD duties. The Committee took into account that it is anticipated that the appointment will not include any contact or dealings with MOD or any lobbying activity. Furthermore, ten months had passed since he left Crown service.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that:</b></p> <p><b>- for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	January 2013
<b>Steve Lamey</b> Director General, Benefits and Credits, and HMRC Commissioner, HM Revenue & Customs	
Left Crown service	July 2012
<b>Chief Operating Officer, Kelway IT Services</b>	
Appointment announced	May 2012
Takes up new appointment	July 2012
<p>Mr Lamey sought permission to accept an appointment as Chief Operating Officer of Kelway, an IT services provider with operations in the UK, South Africa and the United Arab Emirates. He will be responsible for improving the company's performance.</p> <p>When considering the application the Committee noted that although, as a member of HMRC's Executive Committee, he will have been privy to discussions about HMRC's overall IT strategy and that, as Director General lead for Universal Credit, he will have a good knowledge of that programme, it has been five years since he was HMRC's Chief Information Officer.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the conditions that:</b></p> <p><b>- for two years from his last day of service, he should not become involved in any work related to contracts with HMRC or to the Universal Credit Programme; and that</b></p> <p><b>- for two years from the same date, he should not become personally involved in lobbying government on behalf of his new employer.</b></p>	
<b>Date of approval</b>	May 2012

<b>Approval letter</b>	
<b>Sir Stephen Laws KCB QC</b> Former First Parliamentary Counsel	
Retired from Crown service	January 2012
<b>Member of the Executive Committee of the Statute Law Society</b>	
Took up new appointment	May 2012
<p>Sir Stephen sought permission to accept a part-time, unpaid appointment as a member of the Executive Committee of Statute Law Society, a charitable body which aims to educate the legal profession and the public about the legislative process.</p> <p>The Committee could see no reasonable scope for criticism of this unpaid appointment being taken up forthwith as it did not raise any questions of propriety. Although the Committee saw little likelihood that Sir Stephen would seek to use his new position to lobby Government, it considered that it would be proper for the normal two-year restriction on lobbying Government provided by the Rules to be applied.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying Government on behalf of his new employer, the automatic three-month waiting period being waived.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	April 2012
<b>Assistant to the Constitution Unit, University College London</b>	
Took up new appointment	November 2012
<p>Sir Stephen sought permission to accept a part-time, unpaid appointment with the UCL Constitution Unit's working group on House of Lords Reform, in which he would be providing technical advice and drafting assistance with any new proposals.</p> <p>The Committee noted that the Constitution Unit is a leading academic stakeholder in a policy area for which Sir Stephen's former Department provided the Government lead, and that in his former role Sir Stephen was responsible for managing the Government's relationship with UCL. However, the Committee considered that, while questions may have been asked about the propriety of accepting a similar appointment when the Government was preparing its own Bill on House of Lords Reform, Sir Stephen had in fact actively resisted accepting work which could have led to a perceived conflict of interest. The Committee took into account that some seven months had elapsed since Sir Stephen had left his post as First Parliamentary Counsel, and that the Government's abandonment of its own Bill meant that there could be no reasonable criticism of the proposed unpaid work with UCL on conflict of interest or other propriety grounds. The Committee saw little likelihood that Sir Stephen would seek to use his new post to lobby Government, but considered that it would, nonetheless, be proper for the normal two-year restriction on lobbying Government provided by the Rules to be applied.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that: -</b></p> <p><b>for two years from Sir Stephen's last day of service, he should not become personally involved in lobbying Government on behalf of his new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	October 2012
<b>Alison Littley</b> Former Chief Executive, Buying Solutions	
Left Crown service	February 2011

<b>Non-executive director, James Hardie Industries</b>	
Took up new appointment	February 2012
<p>Ms Littley sought retrospective approval for an appointment she had taken up as a non-executive director of James Hardie Industries, an industrial building materials firm which operates mainly in Australia and the USA.</p> <p>The Committee wrote to the Prime Minister noting that the appointment had been accepted before an application had been made for permission to do so. It also noted, however, that Ms Littley had had no official dealings with her new employer and that over a year had passed since she had left Crown service.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved unconditionally.</b></p>	
<b>Date of approval Approval letter</b>	April 2012
<b>Andrew Lloyd CMG MBE</b> Former High Commissioner to Nigeria	
Resigned from Crown service	September 2012
<b>Vice President (Communications), Statoil (UK) Ltd</b>	
Took up new appointment	September 2012
<p>Mr Lloyd sought permission to accept a full-time post as Vice President (Communications) with Statoil, an integrated oil and gas company with upstream oil, gas and biofuel operations in over thirty countries. Mr Lloyd will be responsible for the company's internal and external communications, and for developing its global business strategy and development.</p> <p>When considering the application, the Committee noted that Mr Lloyd was not subject to any automatic waiting period.</p> <p><b>The Foreign Secretary accepted the Committee's recommendation that the application be approved subject to the conditions that:</b></p> <p><b>- for six months from Mr Lloyd's last day in post, he should not return to Nigeria for business purposes, advise on it, or have dealings with companies there;</b></p> <p><b>- for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	
<b>Date of approval Approval letter</b>	September 2012
<b>Gavin Lockhart-Mirams</b> Former Special Adviser, Prime Minister's Office	
Resigned from Crown service	May 2011
<b>Managing Partner, Crest Advisory LLP</b>	
Took up new appointment	January 2012
<p>After leaving Crown service Mr Lockhart-Mirams founded Crest Advisory LLP to provide advice to prospective police and crime commissioners, criminal justice agencies and the security sector. While the company was incorporated in October 2011, he did not begin work on any projects until January 2012.</p> <p>While this was a retrospective application, the Committee noted that Mr Lockhart-Mirams had been out of post for seven months before starting work with his new company. It also received assurances that</p>	



none of the information to which he was privy would give his company an unfair advantage, and it recognised that his former department had no dealings with the company.

**The Committee wrote to the Cabinet Office's interim Permanent Secretary, noting with concern that the appointment had been accepted before an application had been made for permission to do so, and - on the understanding that he did not draw on privileged information available to him whilst in post - recommending that the application be approved subject to the conditions:**

**- for two years from his last day of service, Mr Lockhart-Mirams should not become personally involved in lobbying UK Government Ministers, including Special Advisers, on behalf of his company. She accepted this recommendation.**

As with all Special Advisers, the Committee made its recommendation on the understanding that, if he had already done so, Mr Lockhart-Mirams would be required to confirm in writing to the department that he recognises he will continue to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information and by his duty of confidentiality owed to the Crown.

<b>Date of approval Approval letter</b>	July 2012
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**Lieutenant General Sir Mark Mans KCB CBE**  
Former Adjutant General, Ministry of Defence

Retired from the Army	December 2012
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**Chairman, Defence Advisory Board, Allocate Software**

Took up new appointment	February 2013
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Sir Mark sought permission to accept a part-time, paid appointment with Allocate Software providing guidance and assistance on growing its business within defence. Allocate Software provides specialist workforce optimisation and corporate governance, risk and compliance IT software to public and private sector clients, with a focus on health and social care, defence, and maritime offshore oil and gas industries. Its DefenceSuite applications are designed to integrate operational analysis and force preparation with forecasting, resourcing and costing. Customers include NATO, the Royal Navy and the Army.

When considering this application, the Committee noted that Allocate Software is an MOD supplier. However, the contract it holds was awarded well before Sir Mark became Adjutant General and, while he attended occasional meetings with company employees to provide user feedback regarding the software it supplies, he and the MOD have confirmed that he had no involvement in any decisions affecting them.

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

**- for 12 months from his last day of service, he should not advise on the terms of any bid or contract related to the work of the MOD, and for two years from the same date, he should not become personally involved in lobbying UK Government on behalf of his new employer.**

These conditions would not be intended to prevent Sir Mark from having dealings with the MOD in the normal course of business.

<b>Date of approval Approval letter</b>	February 2013
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**Non-executive director, Capita Defence Services**

Took up new appointment	March 2013
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Sir Mark sought permission to accept a part-time appointment with Capita, one of the UK's largest business outsourcing and professional services companies, with clients in both the public and private sectors. He will provide guidance, advice and assistance on growing Capita's business with Defence. He

expects this to cover HR services, training and career transition, and that it will involve discussions with senior MOD officials.

When considering this application, the Committee noted that, in March 2012, Capita was awarded the contract to deliver the Recruitment Partnership Project by Army HQ. However, while Sir Mark had responsibility for the Army's strategic personnel policy as Adjutant General, he and the MOD have confirmed that he had no dealings with Capita or their competitors, or involvement in any decisions affecting them.

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

- a waiting period of three months from his last day of service; and to the conditions that
- for 12 months from his last day of service, he should not advise on the terms of any bid or contract related to the work of the MOD; and
- for two years from the same date, he should not become personally involved in lobbying UK Government on behalf of his new employer.

These conditions would not be intended to prevent Sir Mark from having dealings with the MOD in the normal course of business.

<b>Date of approval</b> <b>Approval letter</b>	February 2013
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**Christine Mayer**  
Former Chief Executive, HM Courts and Tribunals Service, Ministry of Justice

Retired from Crown service	September 2010
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**Consultant, The Royal Armouries**

Took up new appointment	May 2012
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Ms Mayer was asked by the Royal Armouries to carry out short piece of consultancy work for them.

The Committee noted that Ms Mayer had taken up the appointment before approval had been given for her to do so. However, it was content that it raised no propriety issues.

**The Prime Minister accepted the Committee's recommendation that the application be approved unconditionally.**

<b>Date of approval</b> <b>Approval letter</b>	June 2012
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**Poppy Mitchell-Rose**  
Former Special Adviser, HMT

Left Crown service	January 2013
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**Associate Director, Freud Communications**

Took up new appointment	April 2013
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Ms Mitchell-Rose sought permission to accept a full-time appointment as an Associate Director with Freud Communications.

The Committee noted that Ms Mitchell-Rose's role at HM Treasury had been logistical and organisational, and she not had any significant role in policy decisions. Neither had she handled any significantly commercially sensitive information, nor had substantial dealings with any company that is a competitor of her proposed employer, or any official dealings with her proposed employer.

**The Permanent Secretary accepted the Committee's advice that the application be approved subject to the condition that, for twelve months from her last day of service, Ms Mitchell-**

<b>Rose should not become personally involved in lobbying Government on behalf of her new employer.</b>	
<b>Date of approval</b> <b>Approval letter</b>	November 2012
<b>William Morgan</b> Former Special Adviser, Department of Health	
Left Crown service	September 2012
<b>Adviser to MHP Communications</b>	
Appointment announced	December 2012
<p>Mr Morgan sought permission to accept a part-time appointment as an adviser with MHP Communications.</p> <p>When considering the application, the Committee noted that Mr Morgan had had some limited dealings with the company Health Mandate, which, following a merger with MHP Communications, now forms the latter company's health sector arm, MHP Health Mandate. Mr Morgan attended a meeting with the company and a range of other healthcare stakeholders, in which he updated those present on the Government's NHS plans. However, he had not been involved in any policy decisions that would have directly affected the company or its competitors.</p> <p><b>The Prime Minister accepted the Committee's recommendation that, on the basis that Mr Morgan would not draw on any privileged information available to him as a Special Adviser, his application be approved subject to the conditions that:</b></p> <ul style="list-style-type: none"> <li>- for 12 months from his last day of service, he should not provide advice to his new employer or its clients on any bid or contract directly relating to the work of the Department of Health, and;</li> <li>- for two years from the same date, he should not become personally involved in lobbying UK Government on behalf of his new employer. In addition, Mr Morgan should make clear in any dealings he has with other organisations with which MHP has or is seeking work involving the health sector, that he is not representing the Department of Health and that he has no special access to the Department.</li> </ul>	
<b>Date of approval</b> <b>Approval letter</b>	November 2012
<b>Dame Gill Morgan</b> Former Permanent Secretary, Welsh Government	
Left Crown service	August 2012
<b>Adviser, Compliwithus</b>	
Took up appointment	October 2012
<p>Dame Gill sought permission to accept a part-time appointment with Compliwithus, a start-up company created to help recruiters develop a new approach to employee checks.</p> <p>The Committee noted that Dame Gill had had no official dealings with Compliwithus or its competitors and that, while she envisaged that her role with the company had the potential to improve patient safety and help the NHS and other organisations comply with legal requirements whilst saving money, it was not aimed at government. The Committee also noted that Dame Gill was not a career civil servant and had only been in a government role since 2008; that her role as Permanent Secretary to the Welsh Government did not involve close dealings with Whitehall; and that for the last two years she had been serving a Labour Government in Wales at a time when there was a Coalition Government in Westminster.</p> <p><b>The First Minister accepted the Committee's recommendation that the application be approved subject to the conditions that, for three months after Dame Gill's last day of service, she should have no personal contact with the Welsh Government or with NHS Wales</b></p>	

<b>in relation to her new employer or its business, and that, for two years from the same date, she should not become personally involved in lobbying Government on behalf of her new employer; the automatic three-month waiting period applicable to Permanent Secretaries being waived.</b>	
<b>Date of approval Approval letter</b>	September 2012
<b>Chair of the Clinical Board, London Cancer Alliance</b>	
Took up appointment	November 2012
<p>Dame Gill sought permission to accept a part-time appointment as the Chair of the Clinical Board of London Cancer Alliance, an integrated cancer care system made up of a partnership of 17 NHS trusts across north west, south west and south east London.</p> <p>The Committee noted that Dame Gill had not had any official dealings with London Cancer Alliance; the appointment had no connection with her former Welsh Assembly Government role; and her new role would not involve any dealings with the UK Government.</p> <p><b>The First Minister accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from Dame Gill's last day of service, she should not become personally involved in lobbying Government on behalf of her new employer; the automatic three-month waiting period applicable to Permanent Secretaries being waived.</b></p>	
<b>Date of approval Approval letter</b>	October 2012
<b>Lieutenant General Paul Newton CBE</b> Former Commander Force Development and Training, Army	
Retired from Crown service	30 March 2012
<b>Member of Advisory Board, Babcock International Group PLC</b>	
Announced August 2012, to be taken up in December 2012	
<p>Lt Gen Newton sought permission to accept a part-time appointment with Babcock International Group PLC as a Member of its Defence Advisory Board.</p> <p>When considering this application, the Committee noted that Lt Gen Newton had had only occasional, limited official contact with his prospective employer, which did not involve any contractual dealings with it; that he had had no access to commercially sensitive information concerning his prospective employer's competitors; and that he would not be taking up the appointment until September 2012, some five months after his last day of service.</p> <p><b>The Prime Minister accepted the Committee's recommendation that, on the understanding that Lt Gen Newton would not draw on privileged information available to him whilst in post, his application be approved subject to the conditions that, for 12 months from his last day of service, he should not advise his new employer on any bid or contract directly relating to the work of the MOD, and that, for two years from the same date, he should not become personally involved in lobbying Government on behalf of his new employer.</b></p>	
<b>Date of Approval Approval letter</b>	June 2012
<b>Lord (Gus) O'Donnell GCB</b> Former Cabinet Secretary and Head of the Civil Service, Cabinet Office	
Retired from the Civil Service	December 2011

<b>Strategic Adviser, Toronto Dominion (TD) Bank Group</b>	
Appointment announced Took up new appointment	May 2012 June 2012
<p>Lord O'Donnell sought permission to accept an appointment as a Strategic Adviser to the President and Chief Executive of TD Bank Group. He will provide them with advice on government, regulatory and strategic matters and will assist in explaining its 'growth story' to key constituents.</p> <p>When considering his application the Committee noted that the three-month waiting period usually observed by those at Permanent Secretary level and above had expired. It also noted that TD Bank Group is primarily a retail bank with branches in the US and Canada, and that Lord O'Donnell had had no official dealings with them.</p> <p><b>The Prime Minister accepted the recommendation of the Committee that, the three-month waiting period for Permanent Secretaries and above having expired, the application be approved subject to the conditions that he should not draw on any privileged information available to him whilst in Crown service and that, for two years from his last day of service, he should not become personally involved in lobbying government on behalf of his new employer or its clients.</b></p>	
<b>Date of approval Approval letter</b>	May 2012
<b>Chairman, the Legatum Institute's Commission on Wellbeing Policy</b>	
Appointment announced	July 2012
<p>Lord O'Donnell made a retrospective application for permission to accept a part-time appointment as Chairman of the Legatum Institute's Commission on Wellbeing Policy. The Legatum Institute describes itself as a independent non-partisan public policy organisation. Its new Wellbeing Policy Commission was set up in July 2012 to examine a range of issues, including welfare policy, health, and work and wellbeing.</p> <p>When considering the application, the Committee noted that the three-month waiting period usually observed by Permanent Secretaries and above had expired. It also noted that he had had no official dealings with the Institute. However, it was aware that the appointment was already in the public domain and, when making its recommendation to the Prime Minister, it noted with concern that the announcement had been made before approval had been sought.</p> <p><b>The Prime Minister accepted the Committee's recommendation that, the three-month waiting period for Permanent Secretaries (and above) having expired, the application be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	
<b>Date of approval Approval letter</b>	August 2012
<b>Economics Adviser, Frontier Economics</b>	
Took up new appointment	October 2012
<p>Frontier Economics is one of Europe's largest economics consulting firms. Lord O'Donnell sought permission to accept a part-time role advising on economics and public policy.</p> <p>When considering the application the Committee noted that the three-month waiting period usually observed by Permanent Secretaries and above had expired.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	
<b>Date of approval Approval letter</b>	August 2012

<b>Visiting Professor, London School of Economics</b>	
Took up new appointment	October 2012
<p>Lord O'Donnell sought permission to accept an unpaid, part-time appointment as a Visiting Professor at LSE's Centre for Economic Performance. He will give lectures and seminars with an emphasis on well-being issues.</p> <p>When considering the application the Committee noted that the three-month waiting period usually observed by Permanent Secretaries and above had expired.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	
<b>Date of approval Approval letter</b>	August 2012
<b>Visiting Professor, University College London</b>	
Took up new appointment	October 2012
<p>Lord O'Donnell sought permission to accept a part-time, unpaid appointment as a Visiting Professor in UCL's Constitution Unit. He will give lectures and seminars and assist with the Unit's research.</p> <p>When considering the application the Committee noted that the three-month waiting period usually observed by Permanent Secretaries and above had expired.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	
<b>Date of approval Approval letter</b>	August 2012
<b>Chair, Global Agenda Council on Well-being and Mental Health, World Economic Forum (Davos)</b>	
Took up new appointment	February 2013
<p>Following a speech he gave to the UN in April 2012 on happiness and well-being, Lord O'Donnell was asked to take on the unpaid role of Chair of the World Economic Forum's Global Agenda Group on Well-being and Mental Health.</p> <p>When considering the application the Committee noted that the three-month waiting period usually observed by Permanent Secretaries and above has expired.</p> <p><b>The Prime Minister accepted the recommendation of the Committee that, the three-month waiting period for Permanent Secretaries (and above) having expired, his application be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employers.</b></p>	
<b>Date of approval Approval letter</b>	August 2012
<b>Senior Fellow, Institute for Government</b>	
Took up new appointment	February 2013
<p>Lord O'Donnell has been asked to join the Institute for Government as a Senior Fellow.</p> <p>When considering the application the Committee noted that the three-month waiting period usually observed by Permanent Secretaries and above has expired.</p> <p><b>The Prime Minister accepted the recommendation of the Committee that, the three-month waiting period for Permanent Secretaries (and above) having expired, his application be</b></p>	

<b>approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b>	
<b>Date of approval Approval letter</b>	August 2012
<b>Member, The Economist Trust</b>	
Took up new appointment	September 2012
<p>The Economist Trust was established to ensure the independence of the editor of The Economist. As an unpaid member of the Trust, Lord O'Donnell will be consulted on certain corporate activities such as the appointment of editor or of the Chairman of the Economist Group.</p> <p>When considering your application the Committee noted that the three-month waiting period usually observed by Permanent Secretaries and above has expired.</p> <p><b>The Prime Minister accepted the recommendation of the Committee that, the three-month waiting period for Permanent Secretaries (and above) having expired, his application be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	
<b>Date of approval Approval letter</b>	August 2012
<b>Senior Visiting Fellow, Civil Service College Singapore</b>	
Took up new appointment	November 2012
<p>In 2001 the Singapore Government set up its Civil Service College to provide training, learning, research and staff development for the public sector. Lord O'Donnell will give lectures, workshops and seminars on public policy issues.</p> <p>When considering his application the Committee noted that the three-month waiting period usually observed by Permanent Secretaries and above had expired.</p> <p><b>The Prime Minister accepted the recommendation of the Committee that, the three-month waiting period for Permanent Secretaries (and above) having expired, his application be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	
<b>Date of approval Approval letter</b>	August 2012
<b>Non-Executive Board Member, Brookfield Asset Management</b>	
Took up new appointment	May 2013
<p>Lord O'Donnell sought permission to accept a paid, part-time appointment as a Non-Executive Board Member for Brookfield, a Canadian global asset manager specialising in long-life infrastructure projects, including renewable power, property and private equity.</p> <p>When considering this application the Committee noted that Lord O'Donnell had had no official dealings with Brookfield or its competitors. It also noted that the three-month waiting period usually observed by Permanent Secretaries (and above) had expired.</p> <p><b>The Prime Minister accepted the Committee's advice that the application be approved subject to the following conditions:</b></p> <ul style="list-style-type: none"> <li><b>- Lord O'Donnell should not draw on any privileged information available to him whilst in Crown service; and</b></li> <li><b>- for two years, from his last day of service, Lord O'Donnell should not become personally involved in lobbying UK government on behalf of his new employer or its clients.</b></li> </ul>	

<b>Date of approval Approval letter</b>	March 2013
<b>James O'Shaughnessy</b> Former Special Adviser, Prime Minister's Office	
Resigned from Crown service	October 2011
<b>Honorary Research Fellow, School of Education, University of Birmingham</b>	
Took up new appointment	May 2012
Mr O'Shaughnessy sought permission to accept an unpaid, part-time appointment as an Honorary Research Fellow at the University of Birmingham's School of Education.	
<b>The Permanent Secretary accepted the Committee's recommendation that the appointment be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying government on behalf of his new employer.</b>	
As with all Special Advisers, the Committee made the recommendation on the understanding that Mr O'Shaughnessy had confirmed in writing to the department that he recognises that he will continue to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information, and by his duty of confidentiality owed to the Crown.	
<b>Date of Approval Approval letter</b>	April 2012
<b>Sir William Patey KCMG</b> Former HM Ambassador in Kabul	
Retired from the Diplomatic Service	March 2012
<b>Non-executive Director, HSBC Bank Middle East</b>	
Took up new appointment	July 2012
Sir William sought permission to accept a part-time appointment as a Non-executive Director of HSBC Bank Middle East and as an adviser on the Middle East to HSBC's Chief Executive Officer.	
When considering the application, the Committee noted that Sir William did not have any official dealings with his prospective employer while Ambassador to Afghanistan, and that he did not intend to take up the appointment until 1 July 2012, three months after his retirement from the Diplomatic Service.	
<b>The Foreign Secretary accepted the Committee's recommendation that, on the understanding that Sir William would not be taking up the appointment until 1 July 2012, and on the basis that he would not draw on any privileged information that was available to him as an Ambassador, his application be approved subject to the conditions that, for six months from his last day of service, he should not revisit Afghanistan for business purposes, advise on Afghanistan, or have dealings with companies there, and that, for two years from the same date, he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.</b>	
<b>Date of approval Approval letter</b>	May 2012
<b>Phil Pavitt</b> Director General Change, Security and Information, HM Revenue and Customs	
Resigns from Crown service	January 2013
<b>Independent consultant and commission with Aviva Insurance</b>	
Appointment announced	November 2012



Mr Pavitt sought permission to set up as an independent IT and Project consultant and to accept a commission as Director of IT Transformation with Aviva Insurance.

The Committee noted that Mr Pavitt had spent some 23 years as Chief Information Officer in local government and the private sector prior to joining HMRC in September 2009, and that he had not had any official dealings with Aviva Insurance or its competitors.

**The Prime Minister accepted the Committee's recommendation that, on the basis that there is no change in the circumstances of Mr Pavitt's application up to the date of his departure from the civil service in January 2013, his application be approved subject to the conditions that:**

**- for 12 months from his last day of service, he should not undertake any work which involves providing advice to any company or organisation on the terms of any bid or contract relating directly to the work of HMRC:**

**- for two years from the same date, he should not become personally involved in lobbying Government on behalf of any of his clients: and**

**- for two years from his last day of service, he must seek confirmation from the Committee directly that each individual commission he wishes to accept 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.**

<b>Date of approval Approval letter</b>	November 2012
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**Sir Tom Phillips KCMG**  
Former HM Ambassador in Riyadh

Retired from Crown service	July 2012
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**Trainer/consultant, Centre for Political and Diplomatic Studies (CPDS)**

Took up new appointment	December 2012
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Sir Tom sought permission to accept a part-time appointment as a trainer and consultant with CPDS, who provide training and professional development programmes for diplomats, civil servants, politicians and corporate executives.

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

**- for six months from his last day in post, he should not return to Saudi Arabia for business purposes, give advice on it or have dealings with companies there;**

**- for twelve months from his last day of service, he should not undertake any work for his new employer which involves providing advice on the terms of any bid or contract relating to the work of the FCO; and**

**- for two years from his last day of service, he should not become personally involved in lobbying UK government on behalf of his new employer.**

<b>Date of approval Approval letter</b>	November 2012
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**Member of the Advisory Council of Wilton Park**

Took up new appointment	December 2012
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Sir Tom sought approval to accept a part-time appointment as a member of the Advisory Council of Wilton Park, an executive agency of the FCO.

Given the relationship between the FCO and Wilton Park, the Committee recognised that Sir Tom would

have some contact with the FCO and it saw no difficulty in this.

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

**- for six months from his last day in post, he should not return to Saudi Arabia for business purposes, give advice on it or have dealings with companies there; and**

**for two years from his last day of service, he should not he should not become personally involved in lobbying UK government on behalf of his new employer.**

<b>Date of approval Approval letter</b>	November 2012
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**Associate, Africa Matters Ltd**

Took up appointment	January 2013
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Sir Tom sought permission to become an associate with Africa Matters (AML), a consultancy firm which works with the private sector to mitigate their risk of investing particularly in Africa. Sir Tom was approached by AML's Chairman, Baroness Walker, about joining the company as an associate on a part-time basis. At the present time they are interested in using his services in relation to an Israel-related project that one of their clients, French bank Societe Generale, wishes to undertake, but it is possible that AML may ask him to undertake further work in the future.

When considering the application this application the Committee noted that Sir Tom had had no dealings with AML or its competitors and that, as he left post at the end of May 2012, he was no longer subject to the six-month moratorium observed by former Ambassadors on returning to the country of their last posting for business purposes, giving advice on it or having dealings with companies there.

**The Foreign Secretary accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from his last day of service, Sir Tom should not he should not become personally involved in lobbying UK Government on behalf of his new employer.**

<b>Date of approval Approval Letter</b>	January 2013
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**Senior Advisor and member of the advisory team, GPW**

Took up appointment	March 2013
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Sir Tom Phillips sought permission to accept an appointment as a senior adviser and member of GPW's advisory team. GPW is an international business intelligence firm serving multinationals, law firms, financial institutions, investors and sovereign and government organisations. The organisation provides political risk analysis; relationship and influence mapping; due diligence assessments; dispute consulting and investigations; and political and business monitoring services. It has offices in London and Dubai. His role will be include promoting the company and its business; offering advice and assistance with business development and introductions to new client prospects; attending internal, client and new prospect meetings; and giving advice/assistance on specific assignments. His particular area of focus will be the Middle East but wider engagement is also envisaged. The post is paid.

When considering the application the Committee noted that Sir Tom will have contact and/or dealings with his former Department and Government, and GPW-related work and events might occasionally bring him into contact with Government officials. However there will be no lobbying of Ministers or officials in this role.

**The Foreign Secretary accepted the recommendation of the Committee that, the usual six month moratorium observed by Ambassadors on having business dealings with the country of their last posting having expired, the appointment be approved subject to the condition that, 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.**

<b>Date of approval Approval letter</b>	January 2013
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<b>International Advisor, The Prince's Charities International Sustainability Unit (ISU)</b>	
Took up appointment	March 2013
<p>Sir Tom Phillips sought permission to accept a part-time appointment as International Adviser to The Prince's Charities International Sustainability Unit (ISU). The Prince's Charities International Sustainability Unit was set up in 2010 to build on the success of HRH The Prince of Wales' Rainforests Project. It works to facilitate consensus on how to resolve some of the key environmental challenges facing the world, specifically those to do with food security, ecosystem resilience and the depletion of natural capital. In addition to monitoring progress on the tropical forest finance package agreed at the Oslo Climate and Forest Conference of 2010, the ISU is developing its own sustainable agriculture and marine ecosystems programmes, bringing together public, private and NGO organisations with interests in these areas to advance possible solutions. Sir Tom has been asked to join the ISU as its International Adviser providing it with advice on international affairs. This will take up around three days a month.</p> <p>When considering the application the Committee noted that while Sir Tom will not be required to lobby Government, his role will almost certainly involve occasional contact with Government departments such as the FCO and DFID, in the run-up to visits by The Prince when issues related to the ISU and the sustainable development agenda are involved.</p> <p><b>The Foreign Secretary accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from his last day of service, Sir Tom should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	March 2013
<b>Member of the Advisory Group for Honours and Awards, British Association of Dermatologists</b>	
Took up appointment	April 2013
<p>Sir Tom sought permission to accept an unpaid appointment as a Member of the Advisory Group for Honours and Awards at the British Association of Dermatologists (BAD).</p> <p>When considering this application the Committee took into account the fact that the appointment was unlikely to include contact or dealings with Sir Tom's former department of government. It further noted that Sir Tom had had no official dealings with his prospective employers, nor had he had contractual dealings with them, access to any commercially sensitive information, or involvement in any policy related to BAD.</p> <p><b>The Foreign Secretary accepted the Committee's recommendation that, given the six month moratorium on Ambassadors had already passed, the application be approved subject to the condition that:</b></p> <p><b>- for two years from his last day of service, Sir Tom should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	February 2013
<b>Dame Anne Pringle DCMG</b> Former HM Ambassador to Moscow	
Retired from Crown service	November 2011
<b>Non-executive director, Ashmore Group plc</b>	
Took up new appointment	February 2013
<p>Dame Anne sought permission to accept a part-time paid appointment as a non-executive director of Ashmore Group plc, an investment management company dedicated to emerging markets.</p> <p>When considering this application the Committee noted that Dame Anne had had no dealings with Ashmore Group plc or its competitors. The Committee also noted that she applied for an advertised</p>	

post. Furthermore, as she left Crown service at the end of October 2011, she was no longer subject to the usual six-month moratorium observed by former Ambassadors on returning to the country of their last posting for business purposes, giving advice on it or having dealings with companies there.

**The Foreign Secretary accepted the Committee's recommendation that, noting the usual six-month moratorium had now expired, the application be approved subject to the condition that, for two years from her last day of service, Dame Anne should not become personally involved in lobbying UK Government on behalf of her new employer or its clients.**

<b>Date of approval</b> <b>Approval letter</b>	February 2013
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**Kevin Pringle**  
Former Special Adviser to First Minister, Scottish Government

Resigned from Crown service	August 2012
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**Communications work on referendum on Scottish independence, SNP**

Took up appointment	September 2012
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Mr Pringle sought permission to accept a full-time appointment with the SNP, leading its communications work and preparation for the referendum on Scottish independence in 2014.

The Committee considered that the appointment raised no propriety concerns under the Business Appointment Rules. It noted that Mr Pringle was not subject to the normal two-year lobbying ban imposed on staff at SCS3 level and above.

**The Permanent Secretary of the Scottish Government accepted the Committee's recommendation that the appointment be approved unconditionally.**

<b>Date of approval</b> <b>Approval letter</b>	September 2012
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**Colin Pyle**  
Former Special Adviser to the First Minister, Scottish Government

Resigned from Crown service	September 2012
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**Director of Development, Yes Scotland Ltd**

Took up new appointment	October 2012
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Mr Pyle sought permission to accept a full-time appointment as Director of Development for Yes Scotland, the umbrella organisation set up to campaign for a yes vote in the referendum on Scottish independence in 2014.

When considering the application, the Committee noted with concern that the appointment had been announced before approval had been obtained. However, it was of the view that the appointment raised no propriety concerns under the business appointment rules. It also noted that, as Mr Pyle was not an SCS3 equivalent, he is not subject to the standard two-year lobbying ban imposed on staff at that level.

**The Permanent Secretary of the Scottish Government accepted the Committee's recommendation that the appointment be approved unconditionally.**

As with all Special Advisers, the Committee made its recommendation on the understanding that, if he had already done so, Mr Pyle would be required to confirm in writing to the department that he recognises he will continue to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information and by his duty of confidentiality owed to the Crown.

<b>Date of approval</b> <b>Approval letter</b>	October 2012
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<b>Miriam Rosen</b> Former Interim Chief Inspector of Schools	
End of fixed-term contract	December 2011
<b>Consultant, ARK Schools</b>	
Took up new appointment	September 2012
<p>Ms Rosen sought permission to accept a part-time appointment as a consultant with ARK Schools.</p> <p>When considering the application, the Committee noted that Ms Rosen had had no personal dealings with her prospective employer when she was the Interim Chief Inspector of Schools, and that her proposed new role as a part-time consultant involved assisting with the monitoring of ARK Academies.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the conditions that, for 12 months from her last day of service, she should not provide advice to her new employer on any bid for funding from the Department for Education, and, for two years from the same date, she should not become personally involved in lobbying Government on behalf of her new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	April 2012
<b>Geoff Russell</b> Former Chief Executive, Skills Funding Agency	
Resigned from Crown service	July 2012
<b>Non-executive director, VTB Capital plc</b>	
Took up new appointment	August 2012
<p>Mr Russell sought permission to accept a part-time position as a non-executive director of VTB Capital plc, the investment business of VTB Group, a Russian financial group with operations in Russia, the CIS, Europe, Asia, Africa and the USA.</p> <p>When considering the application the Committee noted that Mr Russell had had no dealings with VTB Capital and that there was no connection between his position as Chief Executive of the Skills Funding Agency and his proposed new role.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer or its clients.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	June 2012
<b>Dr Frances Saunders CB</b> Former Chief Executive, Defence Science and Technology Laboratory (Dstl)	
Left Crown service	March 2012
<b>Non-executive Director, Becatech Systems Ltd</b>	
Took up new appointment	February 2013
<p>Dr Saunders sought permission to accept a part-time appointment as a non-executive director of Becatech Systems, who provide specialist security services and technologies in the UK and overseas. The company went into administration last summer and was then bought by the Guinness Group. Its main product supports the requirements of the Centre for the Protection of National Infrastructure on the perimeter security of water installations and heritage sites. It also provides personal protection devices to US Special Forces, and tracking and other special electronic devices to police, security</p>	

services and intelligence agencies.	
<p>When considering the appointment, the Committee noted that Becatech, in its present form, is a new company that was set up some six months after Dr Saunders left Dstl, and that she had no dealings with its predecessor. It also noted that she had no access to commercially sensitive information on competitors, and that it has now been almost ten months since she left the Agency.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from her last day of service, she should not become personally involved in lobbying UK Government on behalf of her new employer or its clients.</b></p>	
<b>Date of approval Approval letter</b>	February 2013
<b>Susan Scholefield</b> Former Director General HR and Corporate Services, Ministry of Defence	
Retired from Crown service	March 2012
<b>Secretary and Chief Legal Officer of the London School of Economics and Political Science (LSE)</b>	
Took up new appointment	June 2012
<p>Ms Scholefield sought permission to accept a full-time appointment as the Secretary and Chief Legal Officer of the LSE.</p> <p>The Committee noted that she had not, at any point in her career, had significant dealings with her prospective employer or its competitors, or had official responsibility for any matters directly relevant to the LSE's business in education, training and research.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the condition that, for two years from her last day of service, she should not become personally involved in lobbying Government on behalf of her new employer.</b></p>	
<b>Date of approval Approval letter</b>	May 2012
<b>Adam Sharples CB</b> Former Director General of Employment, Department for Work and Pensions	
Left Crown service	November 2011
<b>Non-executive Chairperson, Ixion Group of Companies</b> <b>Member of the Board of Anglia Ruskin University</b>	
Took up appointment	September 2012
<p>Mr Sharples sought permission to become non-executive Chairperson of the Ixion Group of Companies, a non-profit organisation that is part of Anglia Ruskin University. Ixion provides business support services to corporate organisations. It also manages and delivers a range of employment related services, such as NVQs, business small and medium enterprise start-ups and business for growth strategies, mentoring programmes, apprenticeships, reducing re-offending, European framework and innovation funding, training, change management consultancy, business advice, marketing, web and new media development, project management, telemarketing, and contact centre/employer engagement management, to public and private sector clients. In connection with this role he would also become a member of the Board of the University.</p> <p>When considering the application, the Committee noted that Mr Sharples had been responsible for people who had had contractual dealings with Ixion over the last two years of his service. The Committee took into account that Mr Sharples had had dealings with a large number of companies in the welfare to work sector - principally the prime contractors for the Work Programme. He was responsible for the overall design and delivery of the employment programmes but was not directly involved in the detailed assessment of individual bids. As the Director General for Employment at the DWP, he was responsible for advising Ministers on employment programmes. However, he did not</p>	

have any contact with Ixion at any stage. The Committee also took into account that the DWP have no current or historic prime contracts with Ixion but that the company is listed as a subcontractor for twelve live Welfare to Work contracts. The Committee noted that the employment programme policy changed markedly with the introduction of the Work Programme in 2011, but was now stable. The Committee also took into account that Mr Sharples did not have any knowledge as a result of being a former civil servant that would provide an unfair competitive advantage. Finally, the Committee noted that Mr Sharples had had no direct dealings with Ixion or its competitors so his proposed appointment would not appear to be open to criticism that it was a reward for past favours or that he had any access to trade secrets.

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

**- for twelve months from his last day of service, he should not undertake any work for Ixion that involved providing advice on the terms of any bid or contract relating to the work of the DWP; and**

**- for two years from his last day of service, he should not become personally involved in lobbying Government on behalf of his new employer.**

<b>Date of approval Approval letter</b>	August 2012
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**Trustee and Director, The Prince's Initiative for Mature Enterprise**

Took up new appointment	December 2012
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Mr Sharples sought permission to accept a part-time appointment as a Trustee and Director of the Prince's Initiative for Mature Enterprise (PRIME), a national charity that provides support for the over fifties to re-enter the labour market through self-employment.

When considering this application, the Committee noted that Mr Sharples had not had any contractual or official dealings with PRIME over the last two years in Crown service or any significant contractual dealings before that. Whilst Mr Sharples was not personally aware that he had been responsible for people who had contractual dealings with PRIME, given that he was responsible for the labour market programmes, it was possible that some of his staff at the DWP had some contact with them. Mr Sharples had dealings with a large number of companies in the welfare to work sector – principally the prime contractors for the Work Programme - but he was not directly involved in the detailed assessment of individual bids. Furthermore, as the Director General for Employment in the DWP, Mr Sharples was also responsible for advising Ministers on employment programmes. However, the Committee noted that he did not have any contact with PRIME or any of its competitors at any stage. In addition, he did not have access to any commercially sensitive or valuable information that would provide an unfair competitive advantage.

**The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.**

<b>Date of approval Approval letter</b>	December 2012
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**Consultant, The Centre for Economic and Social Inclusion**

Took up new appointment	December 2012
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Mr Sharples sought permission to join a team led by the Centre for Economic and Social Inclusion, a not-for-profit company dedicated to tackling disadvantage and promoting social inclusion in the labour market. The Centre is bidding for a contract to provide consultancy support for the Irish Government in its design and modelling of a proposed new employment programme.

The Committee noted that Mr Sharples had not had any direct contractual dealings with his prospective employer over the last two years of service or any significant contractual dealings before that. Furthermore, he had not been responsible for people who had contractual dealings with them. The



Committee noted that he had provided informal advice to the Irish Government in October-December 2011, after leaving the DWP. Furthermore, the Centre for Economic and Social Inclusion was a partner of the DWP and they jointly organised the annual welfare to work convention, at which Mr Sharples spoke on several occasions. The Committee noted that Mr Sharples had not had access to any commercially sensitive information about any competitors of his prospective employer. Furthermore, he does not have any knowledge that would provide him with an unfair competitive advantage.

**The Prime Minister accepted the Committee's recommendation that the appointment be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.**

<b>Date of approval</b> <b>Approval letter</b>	December 2012
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**Member of the Executive Advisory Board, Praesidian Capital**

Took up new appointment	January 2013
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Mr Sharples sought approval to accept a part-time paid appointment as a member of Praesidian Capital's Executive Advisory Board. Praesidian is a private investment firm, which was established in 2002 in the United States to manage funds on behalf of leading global financial institutions and high net worth individuals. It provides capital to private lower middle market companies. Its investments generally range in size from \$5 million to \$20 million. Mr Sharples will provide advice on the establishment of its business in the United Kingdom and on the political and regulatory environment.

When considering this application, the Committee noted that Mr Sharples had not had any contractual dealings with Praesidian Capital over the last two years or any significant contractual dealings before that. He had dealings with a large number of companies in the welfare to work sector – principally the prime contractors for the Work Programme. However, he had not had access to any commercially sensitive information about any competitors of his prospective employer. The Committee observed that the DWP have no current or historic contracts with Praesidian Capital. Furthermore, Mr Sharples had no knowledge acquired as a result of being a Civil Servant that would provide an unfair competitive advantage. Given that Mr Sharples has had no direct dealings with Praesidian Capital or its competitors, his proposed appointment could not appear to be open to criticism that it was a reward for past favours or that he had any access to trade secrets. Furthermore, there did not appear to be any obvious cross over between his proposed work with Praesidian and his work at the DWP.

**The Prime Minister accepted the recommendation of the Committee that the application be approved subject to the condition that, for two years from his last day of service, Mr Sharples should not become personally involved in lobbying UK Government on behalf of his new employer.**

<b>Date of approval</b> <b>Approval letter</b>	August 2012
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**Sir Nigel Sheinwald GCMG**  
Former HM Ambassador in Washington

Retired from Diplomatic Service	March 2012
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**Senior Advisor on international policy and strategy, Universal Music Group**

Took up appointment	September 2012
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Sir Nigel sought permission to accept a part-time appointment as a Senior Advisor to the CEO and Chairman, and other senior executives of Universal Music Group, on international political developments, market strategies and regulatory issues.

When considering the application, the Committee had noted that it had been over three months since Sir Nigel had left Crown service and nearly six months since he left post. The Committee also received assurances that any dealings Sir Nigel had with UGM whilst in post did not go beyond normal official contact and recognised that the FCO does not have any relationship with the company.

**The Foreign Secretary accepted the Committee's recommendation that the application be approved - on the understanding that he would not draw on privileged information available to him whilst in post - subject to the condition that, for two years from his last day of**



<b>service, he should not become personally involved in lobbying UK Government Ministers or crown servants, including Special Advisers, on behalf of his new employer.</b>	
<b>Date of approval Approval letter</b>	July 2012
<b>Adam Smith</b> Former Special Adviser to the Secretary of State for Culture, Media and Sport	
Left Crown service	April 2012
<b>Consultant, Pinewood Shepperton</b>	
Took up new appointment	July 2012
<p>Mr Smith sought permission to undertake two short pieces of work for Pinewood Shepperton film studios. He had been asked to write a speech for the Chief Executive to deliver at the Global Business Summit on Creative Content hosted by UKTI, and to carry out a research project on film and tv studio production facilities in the UK.</p> <p>The Committee was of the view that the proposed work raised no particular propriety concerns under the Business Appointment Rules provided that he did not draw on any privileged information that was available to him as a Special Adviser or become engaged in lobbying his former department.</p> <p><b>The Permanent Secretary accepted the Committee's recommendation that the application be approved subject to the condition that, for six months from his last day of service, he should not become personally involved in lobbying DCMS on behalf of his new employer.</b></p> <p>As with all Special Advisers, the Committee made its recommendation on the understanding that, if he had already done so, Mr Smith would be required to confirm in writing to the department that he recognises he will continue to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information and by his duty of confidentiality owed to the Crown.</p>	
<b>Date of approval Approval letter</b>	July 2012
<b>Professor Sir Adrian Smith</b> Director General, Knowledge and Innovation, Department for Business, Innovation and Skills	
End of fixed term contract	August 2012
<b>Vice-Chancellor, University of London</b>	
New appointment announced Appointment to be taken up	June 2012 September 2012
<p>Sir Adrian sought permission to accept a full-time appointment as the Vice-Chancellor of the University of London when his fixed-term contract ends in August 2012.</p> <p>When considering the application the Committee noted the inward-facing nature of his new role, his previous association with the University as its Deputy Vice-Chancellor and his lengthy experience in academic administration before joining the Civil Service. It also took into account the information he and the department had provided with regard to his lack of involvement in policy which would have had an impact on his new employer.</p> <p><b>The Prime Minister accepted the recommendation that the appointment be approved subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	
<b>Date of approval Approval letter</b>	May 2012

<b>Tim Smith</b> Former Chief Executive, Food Standards Agency	
Resigned from Crown service	October 2012
<b>Group Technical Director, Tesco PLC</b>	
Appointment announced September 2012 , to be taken up in October 2012	
<p>Mr Smith sought permission to accept a full-time appointment as Group Technical Director of Tesco PLC.</p> <p>When considering the application, the Committee noted that Mr Smith had not had any contractual dealings with Tesco over the last two years of his service, or any significant contractual dealings with the company before that - nor has he been responsible for individuals who have had such dealings with his proposed employer.</p> <p>The Committee took into account the fact that Mr Smith has had official, non contractual, contact with his prospective employer during the normal course of his work as a Crown servant with the FSA. The FSA liaises with staff at Tesco PLC, as a major food retailer, in relation to the following: incident management (for example, the withdrawal or recalling of products); collaborating on initiatives to reduce food borne illness; meetings of the Institute of Grocery Distribution Technical Forum (attended by all retailers and key manufacturers); and liaison with the British Retail Consortium and its members on policy issues. In addition, the FSA is the authority within the UK for food safety and standards for all commercial food production, including all UK based food suppliers to companies such as Tesco PLC. The FSA regulates meat businesses that supply UK retailers and catering outlets and charges for its regulatory activities. Tesco PLC does not, however, own any food processing businesses in the UK.</p> <p>The Committee noted that Mr Smith has had dealings with other companies, including all of the UK's major food retailers, dairy companies, meat producers and quick service restaurants; various grocery manufacturers and food service businesses; and all UK farming unions. However, the Committee took into account that, during the course of his official duties, Mr Smith did not have access to commercially sensitive information about Tesco PLC's competitors.</p> <p>The Committee observed that the FSA works in a transparent manner and that it does not treat any business more or less favourably. Policy decisions are made by a Board of non-executive members at open meetings that are broadcast live and are available on the FSA's website. The Committee noted that, whilst Mr Smith would attend these meetings, he was not - as Chief Executive - a member of the Board. Furthermore, Mr Smith was not in a position in his role with the FSA to make policies that could benefit or harm one company over another. The proposed appointment could not, therefore, be deemed a reward.</p> <p>The Committee further noted that Mr Smith would serve one month's notice before joining Tesco PLC.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from his last day of service, Mr Smith should not become personally involved in lobbying the UK Government on behalf of his new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	August 2012
<b>Admiral Sir Trevor Soar KCB OBE</b> Former Commander in Chief Fleet, Royal Navy	
Retired from Crown service	March 2012
<b>Independent consultant and commission with Babcock International Group</b>	
Took up new appointment	September 2012
Admiral Soar sought permission to set up as an independent consultant offering services to a wide range of business leaders on long term strategy; formulation of business plans; and leadership and risk management, and to accept a commission with Babcock International Group.	

When considering the application, the Committee noted that Admiral Soar's intention was to provide strategic business advice not specific to defence or to specific contracts. The Committee also noted that his last day in post was 6 January 2012, that he had confirmed that in his previous role he had limited influence over MOD commercial arrangements, and that he had not exerted any influence over MOD contracts or commercial arrangements over the past two years.

**The Prime Minister accepted the Committee's recommendation that the application be approved, on the basis that Admiral Soar would not draw on privileged information available to him whilst in post, subject to the conditions that:**

**- for six months from his last day of service, he should not seek to accept any commission with companies in the defence sector; and**

**- for 12 months from the same date, he should not undertake any work which involved providing advice to any company or organisation on the terms of any bid or contract relating to the work of the MOD; and**

**- for two years from the same date, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of his clients; and that**

**- 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).**

*Commissions:*

C&P Recruitment  
Newton Europe  
British Maritime Security  
Gemini Maritime

**Date of approval**  
**Approval letter**

April 2012

**Non-executive Chairman, Vessel Protection Solutions Ltd**

Took up new appointment

September 2012

Admiral Soar sought permission to accept a part-time appointment as Non-executive Chairman of Vessel Protection Solutions Ltd.

When considering the application, the Committee noted that Admiral Soar had already sought and received approval to accept a commission with VPS, following the approval of his independent consultancy, that he had had no official dealings with the company or its competitors, and that the company works with clients from the commercial shipping sector rather than the military.

**The Prime Minister accepted the Committee's recommendaion that the application be approved on the same terms as the commission with VPS, namely that, for 12 months from his last day of service, he should not advise his new employer on the terms of any bid or contract for MOD business; and that, for two years from the same date, he should not become personally involved in lobbying UK Government on behalf of his new employer.**

**Date of approval**  
**Approval letter**

August 2012

**Susie Squire**

Former Special Adviser to the Secretary of State for Work and Pensions

Resigned from Crown service

June 2012

**Head of Press, the Conservative Party**

Took up new appointment	July 2012
<p>Ms Squire sought permission to accept a full-time post as Head of Press for the Conservative Party.</p> <p>The Committee was of the view that the appointment raised no propriety concerns under the Business Appointment Rules. It noted that Ms Squire was not an SCS Payband 3 equivalent and therefore she is not subject to the standard two-year lobbying ban imposed on staff at that level.</p> <p><b>The Permanent Secretary of the Department for Work and Pensions accepted the Committee's recommendation that the application be approved unconditionally.</b></p> <p>As with all Special Advisers, the Committee made the recommendation on the understanding that, if she has not already done so, she must confirm in writing to the department that she recognises that she continues to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information, and by her duty of confidentiality owed to the Crown.</p>	
<b>Date of approval</b>	June 2012
<p><b>Paul Stephenson</b> Former Special Adviser, Department of Health</p>	
Left Crown service	September 2012
<p><b>Director of External Affairs, British Banking Association</b></p>	
Took up appointment	December 2012
<p>Mr Stephenson sought permission to accept a full-time appointment as the Director of External Affairs with the British Banking Association.</p> <p>The Committee noted that Mr Sephenson had had no official dealings with the British Banking Association as a Special Adviser and that the Department was satisfied that he had had no significant dealings with any financial services firms.</p> <p><b>The Permanent Secretary accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from his last day of service, Mr Stephenson should not become personally involved in lobbying the UK Government on behalf of his new employer or any of its members.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	November 2012
<p><b>Bill Stow CMG</b> Former Director General, Department of the Environment, Food and Rural Affairs</p>	
Retired from the civil service	January 2012
<p><b>Member of Council of The Wildlife Trusts</b></p>	
Took up appointment	November 2012 (attended first meeting in December 2012)
<p>Mr Stow sought permission to accept a part-time, unpaid appointment as a Member of Council of The Wildlife Trusts.</p> <p>The Committee noted that, as a DEFRA Board member, Mr Stow would have taken part in discussions on issues of interest to the Trusts, but that he had no direct responsibility for decisions or advice to Ministers on any such matters. The Committee also noted that The Wildlife Trusts is not a lobbying or advocacy body and that, as over nine months had elapsed since Mr Stow left his former Departmental post, he will have no recent knowledge of internal thinking on policy issues.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from his last day of service, Mr Stow should not become personally involved in lobbying UK Government on behalf of his new employer.</b></p>	

<b>Date of approval Approval letter</b>	November 2012
<b>Oliver Waghorn</b> Former Special Adviser to the Secretary of State for Defence	
Left from Crown Service	October 2012
<b>An Adviser with Internal Consulting UK</b>	
Took up new appointment	January 2012
<p>Mr Waghorn who sought permission to accept a paid appointment as an adviser with Interel Consulting UK. Interel Consulting UK is a strategic communications and government relations company, in a role that involves providing corporate communications, reputation management and public affairs advice to a range of clients in the UK and Europe.</p> <p>When considering the application, the Committee noted the fact that Mr Waghorn anticipates that his new appointment will include contact and/or dealings with his former department/Government if required to attain publically available information or to coordinate communications in areas of mutual interest. However, the Committee noted that he does not anticipate any lobbying activity at any level.</p> <p><b>The Permanent Secretary accepted the Committee's recommendation that the application be approved on the following terms:</b></p> <ul style="list-style-type: none"> <li>- for 12 months from his last day of service, he should not advise on the terms of any bid or contract related to the work of the MOD or have contact with senior officials at the MOD in relation to any bids or contracts; and</li> <li>- for two years from his last day of service, Mr Waghorn should not become personally involved in lobbying Government on behalf of his new employer, its parent company or its clients.</li> </ul>	
<b>Date of approval letter Approval Letter</b>	January 2013
<b>Moira Wallace OBE</b> Former Permanent Secretary, Department for Energy and Climate Change	
Left Crown service	October 2012
<b>Provost, Oriel College Oxford</b>	
New appointment announced To be taken up	February 2013 September 2013
<p>Ms Wallace sought permission to accept a full-time appointment as the Provost of Oriel College Oxford, a full-time paid role providing leadership of the college and governing body. She does not expect to have any contact with government.</p> <p>When considering the application the Committee noted that the usual three-month waiting period observed by former Permanent Secretaries had expired. It also noted that her new appointment has no connection with her former role and that she did not intend to take it up until 1 September 2013.</p> <p><b>The Prime Minister accepted the Committee's recommendation that, the three-month waiting period observed by former Permanent Secretaries having expired, the application be approved subject to the condition that, for two years from her last day of service, she should not become personally involved in lobbying UK Government on behalf of her new employer</b></p>	
<b>Date of approval Approval letter</b>	February 2013

**Katie Waring** Former Special Adviser to the Secretary of State, Department of Energy and Climate Change

Resigned from Crown service	February 2013
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**Head of Corporate Affairs, Global Radio**

Took up new appointment	February 2013
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Ms Waring sought permission to accept a full-time, paid appointment as Head of Corporate Affairs at Global Radio, one of the UK's largest radio companies, with control over a number of radio stations including Heart, Capital and Classic FM. It forms part of Global, which also includes Global Talent and Global Publishing. Her new role will involve working closely with its Board, developing a strategic plan for its corporate affairs and helping shape the business.

When considering this application, the Committee took into account the fact that, during her last two years of service, Ms Waring has not: had any contractual dealings with her prospective employer; had access to any commercially sensitive information about any of her prospective employer's competitors; or been involved in the development or administration of any policy or decisions (including the award of grants) that could have affected her prospective employer or its competitors. The Committee was, therefore, of the view that the proposed post raised no particular propriety concerns under the Business Appointments Rules.

**The Permanent Secretary of DECC accepted the Committee's recommendation that the appointment be approved subject to the condition that, for two years from her last day of service, Ms Waring should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of her new employer, its parent company or its clients.**

As with all Special Advisers, the Committee made this recommendation on the understanding that, if she has not already done so, Ms Waring must confirm in writing to your Department that she recognises that she continues to be bound by the provisions of the criminal law (including the Official Secrets Act), which protect certain categories of information, and by her duty of confidentiality owed to the Crown.

<b>Date of approval</b> <b>Approval letter</b>	February 2013
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**Sir David Warren KCMG**  
Former HM Ambassador to Tokyo

Retired from Crown Service	January 2013
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**Part-time consultant and Visiting Professor at De Montfort University**

Took up new appointment	March 2013
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Sir David sought permission to accept a part-time appointment as a consultant and Visiting Professor at De Montfort University. He will be advising on the University's evolving strategy of engagement with Japan and undertake workshops with public policy students. He will also be engaging with the Theatre Archive Project, a joint British Library/De Montfort project reinvestigating British theatre history 1945-1968, from the perspectives of both the theatregoer and the practitioner, and he will carry out interviews and research as part of this. He expects his work for the university to take up around four days a month.

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

- for six months from his last day in post he should not return to Japan for business purposes, give advice on it or have dealings with companies there; and**
- for two years from his last day of service, Sir David should not become personally involved in lobbying UK government on behalf of his new employer.**

<b>Date of approval Approval letter</b>	January 2013
<b>Member of the Advisory Council of the London Symphony Orchestra</b>	
Took up new appointment	March 2013
<p>Sir David sought advice on accepting an unpaid appointment as a member of the Advisory Council of the London Symphony Orchestra (LSO). The Advisory Council that Sir David would join is comprised of individuals who place their expertise and experience at the disposal of the LSO and are consulted on for particular advice. Sir David will be working part time, four days a year, and advising the LSO on the development of their business and profile in Japan.</p> <p>The Committee took into account the fact that Sir David had had no direct contractual dealings with the LSO during his last two years of service, nor had he been involved in the development or administration of any policy or decisions that could have affected the LSO or their competitors. Furthermore, he had not had access to any commercially sensitive information about the LSO's competitors.</p> <p><b>The Foreign Secretary accepted the Committee's recommendation that the application be approved subject to the conditions that:</b></p> <p><b>- for six months from Sir David's last day in post, he should not return to Japan for business purposes, give advice on it or have dealings with companies there; and</b></p> <p><b>- for two years from Sir David's last day of service, he should not become personally involved in lobbying the UK Government on behalf of his new employers or their clients.</b></p>	
<b>Date of Approval Approval letter</b>	March 2013
<b>Chairman of the Japan Society</b>	
Took up new appointment	March 2013
<p>Sir David sought advice on accepting an unpaid role as Chairman of the Japan Society, a charitable organisation promoting social and economic links between the UK and Japan, working two days per month. He had been approached about this position.</p> <p>The Committee took into account the fact that Sir David had had no contractual dealings with the Japan Society during his last two years of service and had not been involved in the development or administration of any policy or decisions that could have affected the Japan Society or their competitors. Furthermore, he had not had access to any commercially sensitive information about the Japan Society's competitors.</p> <p><b>The Foreign Secretary accepted the Committee's recommendation that the application be approved subject to the conditions that:</b></p> <p><b>- For six months from Sir David's last day in post, he should not return to Japan for business purposes, give advice on it or have dealings with companies there; and</b></p> <p><b>- for two years from Sir David's last day of service, he should not become personally involved in lobbying the UK Government on behalf of his new employers or their clients.</b></p>	
<b>Date of Approval Approval letter</b>	March 2013
<b>Distinguished Friend and Adviser to the Migration Museum Project</b>	
Took up new appointment	May 2013
<p>Sir David sought permission to accept an unpaid appointment as a Distinguished Friend and Adviser to the Migration Museum Project, working four days per year, taking part in and hosting promotional events and seminars on migration related themes. He received a personal invitation to this role.</p> <p>When considering this application the Committee took into account the fact that Sir David had not had</p>	

any direct official or contractual dealings with his prospective employer during his last two years of service. Furthermore, he had not been involved in the development or administration of any policy or decisions that could have affected his prospective employer or its competitors and had not had access to commercially sensitive information about any competitors.

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

**- for six months from his last day in post, Sir David should not return to Japan for business purposes, give advice on it or have dealings with companies there; and**

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

<b>Date of Approval Approval letter</b>	March 2013
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**Member of the Advisory Council of the Migration Matters Trust**

Took up new appointment	April 2013
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Sir David sought permission to accept an unpaid, part-time role as a Member of the Advisory Council of the Migration Matters Trust. The Trust is a cross-party, pro-legal migration group, set up to discuss and challenge the anti-immigration consensus of the current public debate. Sir David was approached for this role, which would include involvement in public meetings and communication with the press.

When considering this application the Committee took into account the fact that Sir David had not had any direct official or contractual dealings with his prospective employer during his last two years of service. Furthermore, he had not been involved in the development or administration of any policy or decisions that could have affected his prospective employer or its competitors; nor had he had access to commercially sensitive information about any competitors.

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

**- for six months from his last day in post, Sir David should not return to Japan for business purposes, give advice on it or have dealings with companies there; and**

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

<b>Date of Approval Approval letter</b>	March 2013
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**Sir Bob Watson CMG**  
Former Chief Scientific Adviser, Department for Environment, Food and Rural Affairs

End of fixed-term contract	September 2012
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**Part-time role with Monash University**

Took up new appointment	January 2013
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Sir Bob sought permission to accept a part-time post with Monash University, Melbourne. He has been asked to design and lead a yearly conference or series of think tanks on sustainability issues for the South East Asia and Pacific Region.

When considering the application, the Committee noted Sir Bob's long scientific career and that this will be a part-time role designing and leading a yearly conference or series of think tanks on sustainability issues for the South East Asia and Pacific Region for an Australian university.

**The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that, for two years from his last day of service, Sir Bob should not become personally involved in lobbying the UK Government on**



<b>behalf of his new employer.</b>	
<b>Date of approval</b> <b>Approval letter</b>	November 2012
<b>Lieutenant General Barnabas White-Spunner KCB CBE</b> Former Commander of the UK Field Army	
Retired from the Army	January 2012
<b>Executive Chairman, The Countryside Alliance</b>	
Took up new appointment	February 2012
<p>Lieutenant General White-Spunner made a retrospective application for permission to accept a part-time appointment as the Executive Chairman of the Countryside Alliance. The Countryside Alliance is a charity that campaigns on rural issues.</p> <p>The Committee noted with concern that the appointment had been taken up before approval of it could be granted.</p> <p><b>The Prime Minister accepted the Committee's recommendation that the application be approved retrospectively subject to the condition that, for two years from his last day of service, he should not become personally involved in lobbying Ministry of Defence Ministers or officials, including Special Advisers, on behalf of his new employer.</b></p>	
<b>Date of approval</b> <b>Approval letter</b>	April 2012
<b>Dr Sean Worth</b> Former Special Adviser, Prime Minister's Office	
Resigned from Crown service	June 2012
<b>Head of the Better Public Services Project, Policy Exchange</b>	
Took up new appointment	June 2012
<p>Dr Worth sought permission to accept a full-time position as Head of the Better Public Services Project, which has been set up by think tank Policy Exchange to examine the impact of greater competition, technological innovations and new models of service ownership on the delivery of public services.</p> <p>When considering the application the Committee noted that Dr Worth had had no dealings with Policy Exchange whilst in office and that he had had no involvement in policy development. It also recognised the wide-ranging nature of the role he wished to accept and that Policy Exchange is a registered charity.</p> <p><b>The Permanent Secretary of the Cabinet Office accepted the Committee's recommendation that the application be approved subject to the condition that, for 12 months from his last day of service, he should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of his new employer.</b></p> <p>As with all Special Advisers, the Committee made its recommendation on the understanding that, if he had already done so, Dr Worth would be required to confirm in writing to the department that he recognises he will continue to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information and by his duty of confidentiality owed to the Crown.</p>	
<b>Date of approval</b>	June 2012
<b>Strategic adviser to the public affairs practice of MHP Communications</b>	
Took up new appointment	September 2012

Dr Worth sought permission to accept a part-time appointment as a strategic adviser to public affairs and PR company MHP Communications. He will work with its public affairs practice, providing political counsel to some clients and in order to help to train MHP staff.

The Committee noted that Dr Worth had had no official dealings with his new employer and that he had not had access to any commercially sensitive information about its competitors.

**The Permanent Secretary of the Cabinet Office accepted the Committee's recommendation that the application be approved subject to the condition that, for 12 months from his last day of service, he should not become personally involved in lobbying Government on behalf of his new employer or its clients.**

As with all Special Advisers, the Committee made its recommendation on the understanding that, if he had already done so, Dr Worth would be required to confirm in writing to the department that he recognises he will continue to be bound by the provisions of the criminal law (including the Official Secrets Act) which protect certain categories of information and by his duty of confidentiality owed to the Crown.

<b>Date of approval</b>	September 2012
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