



Advisory Committee on Business Appointments

Fifteenth Annual Report

2013-2014



ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

29 October 2014

Dear Prime Minister,

FIFTEENTH ANNUAL REPORT

This letter accompanies the fifteenth report of the Advisory Committee on Business Appointments, covering the period from 1 April 2013 to 31 March 2014.

During 2013/14, the Committee considered significantly more requests for advice but these were received from fewer applicants – 216 applications from 83 applicants compared with 172 applications from 92 applicants in 2012/13.

The historically high number of applications submitted to the Committee appears to be not so much a function of reductions in headcount across Whitehall and in the Armed Services, or reshuffles in the case of Ministers, but more a result of the relatively new requirements for Ministers and the most senior Crown servants (including special advisers) to seek approval for both paid and unpaid appointments, and for them to secure clearance for each proposed commission assumed under consultancies previously approved by the Committee.

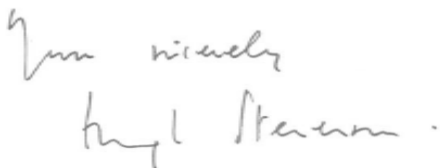
The Committee dealt with 72% of applications within its published timescales, compared with 87% in 2012/13. Although year-on-year comparisons can be misleading, not least because each case varies in its complexity, we believe the decrease is largely due to the 25% increase in the number of cases before us. However, we are not complacent and we are reviewing what more we can do to improve our ways of working. We meet regularly to consider all aspects of our work, to discuss cases with applicants, and to ensure that our approach remains consistent.

During the year the Government updated the Committee on progress towards a new iteration of the Rules. These have now been published by the Government and, although outside the timeframe for this report, the Committee particularly welcomes the Government's commitment to increased transparency.

The Committee naturally takes a keen interest in the steps taken by departments to ensure that their staff are fully aware of the rules and that they know what they need to do to comply with them. This report describes the programme of informal compliance checks carried out by the Committee's secretariat on behalf of the Government, which concluded during the reporting period. It is encouraging that these checks showed that the overwhelming majority of departments had

effective procedures in place to manage their business appointments processes. However, evidence of compliance was not universal and we are very concerned when Crown servants seek advice from us retrospectively, or when it comes to our attention that people have moved into posts outside Crown service without seeking our advice. To be fair to the overwhelming majority of applicants, I should be clear that the problem does not seem to be widespread at present. However, such cases do occur more frequently than the Committee would like. The Committee is only charged with applying the rules; ultimately they are “owned” by Government, with the responsibility within departments lying with the relevant Permanent Secretary. It is for departments, with the Cabinet Office in the lead, to ensure that their staff are aware of the rules, that they are reminded of them at appropriate intervals, and that they are alerted to their obligations under them when they leave Crown service.

The Committee was sorry to say goodbye to Lord Macdonald and to its Chairman, Lord Lang, in July 2013 and March 2014 respectively. I pay tribute to their valuable contributions, and on behalf of all the Committee I also thank Lord Lang for his admirable leadership as Chairman. As interim Chairman, I very much look forward to working with his permanent successor once he or she is appointed.

A handwritten signature in cursive script that reads "Yours sincerely Hugh Stevenson".

Sir Hugh Stevenson



ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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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 has eight members. Three are nominated by the main political parties and the remaining five are independent members. The latter, 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. In July 2013 Lord Macdonald, the Labour Party member of the Committee, stepped down and was replaced by Baroness Liddell.
4. The Chairman of the Committee during this reporting period was Lord Lang of Monkton, the Conservative Party member¹.



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,

¹ From April 2014 when his term as Chairman came to an end, Lord Lang was replaced, on an interim basis, by Sir Hugh Stevenson while the Government runs an open competition for Lord Lang's successor.

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 that Committee again since 2012.

5. The other members of the Committee during the reporting period were:
 - Mark Addison, independent member
 - Sir Colin Budd, independent member
 - Lord (Navnit) Dholakia, Liberal Democrat member
 - Mary Jo Jacobi, independent member
 - Baroness (Helen) Liddell of Coatdyke, Labour 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.



Colin Budd joined the Diplomatic Service in 1967. During his career he served in Warsaw, Islamabad, The Hague and Bonn, and was for 3 years Chef de Cabinet to the Vice-President of the European

Commission. In the UK he was Private Secretary to two Cabinet Ministers and chaired the Joint Intelligence Committee (1996 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), and of the QC Selection Panel from 2009-2013. He is currently on the Board of the London School of Economics' IDEAS centre for the study of international affairs



After spending his early years in Tanzania and India, 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.



Mary Jo Jacobi has held senior roles in the banking and financial services industry at HSBC, Lehman Brothers and Drexel Burnham Lambert. She has also been a global oil and gas industry

executive as Vice President, Group External Affairs at Royal Dutch Shell and as Executive Vice President at BP America following the Gulf of Mexico Oil Spill. She was also a Non-Executive Director of Tate and Lyle plc. Mary Jo was formerly an aide to President Ronald Reagan, joining his administration in 1981 and serving in the White House as Special Assistant for Business Liaison. She resumed US Government service in 1992 when President George H W Bush appointed her Assistant US Secretary of Commerce. 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 the Weir Group PLC and 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 is a member of the Wilton Park USA Foundation Board.



Baroness (Helen) Liddell of Coatdyke was MP for Monklands East from 1994 to 1997, and then for Airdrie and Shotts until 2005. She held a number of Ministerial positions including Economic Secretary to the

Treasury, Energy Minister and Minister of State for Transport before becoming Secretary of State for Scotland from 2001 to 2003. She was British High

Commissioner to Australia until 2009 and was made a life peer in 2010. Baroness Liddell was part of the review of the circumstances surrounding the helicopter crash on the Mull of Kintyre at the request of the Coalition Government and was on the Joint Committee on the Prevention of Terrorism. She is also a member of the House of Lords European Scrutiny Committee dealing with Justice and Consumer Affairs.



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.



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 2nd 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.

ROLE OF THE COMMITTEE

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 (since updated) 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 Minister² 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.

² Advice is provided to the Foreign Secretary if the applicant is from the diplomatic service, the Defence Secretary for most Ministry of Defence staff, 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.

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 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 158 appointments of Crown servants and on 58 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, two 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 total net expenditure for 2013/14 was £196,000. This compares with £163,000 in 2012/13. The main reason for the difference is that the Committee is now required to account directly for the accommodation and other service charges it pays to the Cabinet Office. These costs (approximately £65,000) were previously absorbed within the Cabinet Offices' accounts.
19. The main item of expenditure was secretariat costs. Since April 2013, secretariat services for the Committee have been provided by the joint Civil Service Commission secretariat. The cost of the service provided to the committee was approximately £104,000 (compared with approximately £122,000 in 2012/13). The Committee's expenditure is included within the Civil Service Commission's audited accounts, which are published at <http://civilservicecommission.independent.gov.uk/publications/annual-reports/>
20. Committee members' fees of £8,000 per annum for the Chairman and £3,000 per annum for other members remained unchanged and totalled £27,000.

PART 2 –MINISTERS

INTRODUCTION – THE MINISTERIAL CODE

21. 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 however equally important that when a former Minister takes up a particular appointment or employment, there should be no cause for any suspicion of impropriety.
22. 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.
23. 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.”
24. In the reporting period, the Committee advised 26 former Ministers in relation to 58 appointments. This includes advising on five commissions under the terms of already agreed independent consultancies.

THE PROCESS

25. 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 72% of cases.

26. 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.
27. 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.
28. 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, 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.

29. 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.
30. 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.
31. Further information about the Committee's advice on appointments taken up by former Ministers in 2013/14 is at Annex A.

PART 3 - CIVIL SERVANTS

INTRODUCTION – THE BUSINESS APPOINTMENT RULES

32. 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.
33. 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).
34. 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.
35. 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.
36. The Rules apply to all Crown servants, including special advisers. 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.

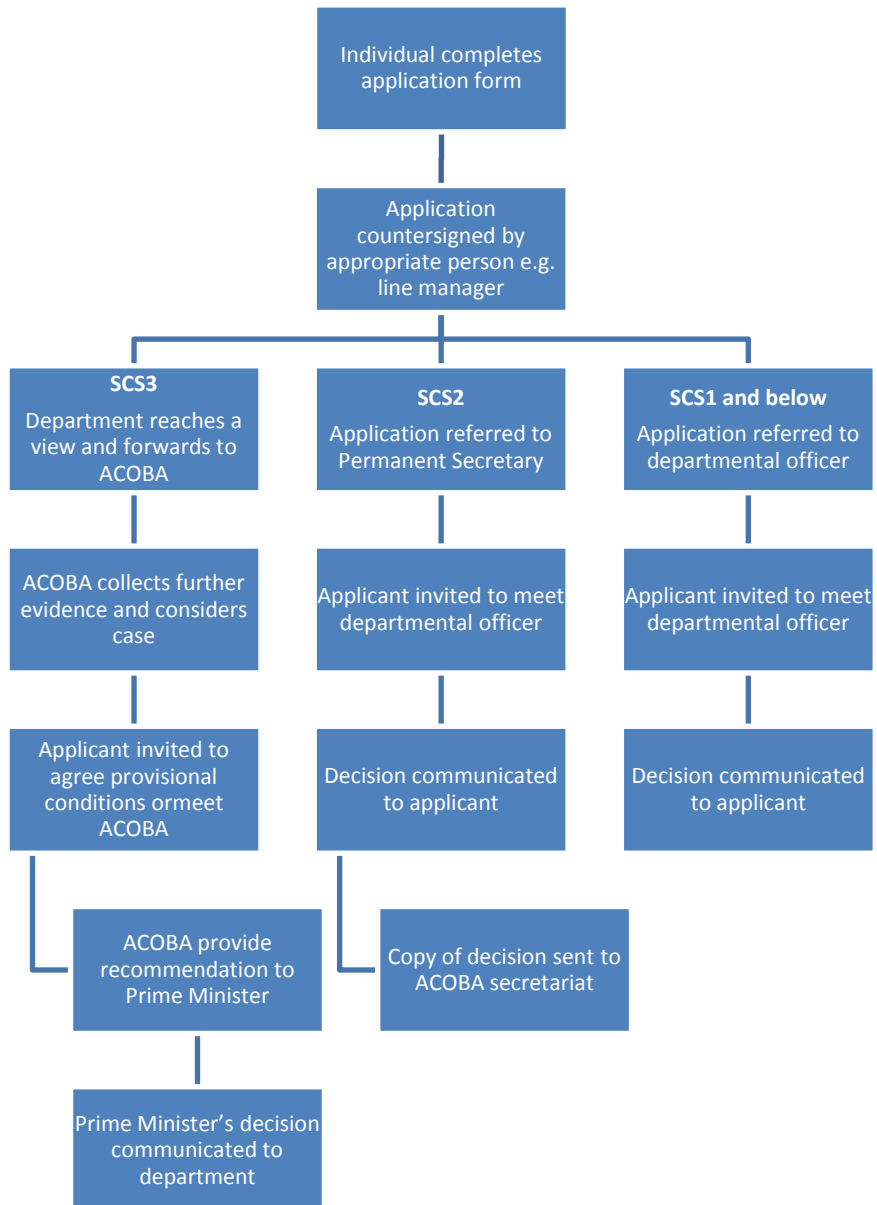
37. With regard to applications from civil servants in the Devolved Administrations in Scotland and Wales, the Committee provides advice to the relevant First Minister.
38. Not all applications are referred to the Committee – only those of the most senior civil servants at Director General and Permanent 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.
39. In the reporting period, the Committee advised 57 Crown servants in relation to 158 appointments. This includes advising on 58 commissions under the terms of already agreed independent consultancies.

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, 79% of cases were dealt with within the 20 day target.

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 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 (or other decision-making Minister – see paragraph 8 above), 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.
47. Further information about the Committee's advice on appointments taken up by former Crown servants in 2013/14 is at Annex B.

THE PROCESS



PART 4 - THE COMMITTEE'S APPROACH

RESTRICTIONS

48. 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.
49. In order to be fair and reasonable, each case is judged on its own merits.
50. The Committee's advice ranges from unconditional approval to, in a small number of cases, judging that an appointment is unsuitable. In 2013/14, 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

51. 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

52. 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

53. 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.
54. 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 unable to deal with any enquiries about the appointment, since it does not disclose information about appointments which have not yet been taken up or announced, and this can lead to the false assumption that an individual has not complied with the Rules.
55. 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.

56. 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 four appointments during this reporting period).

PART 5 – COMPLIANCE ASSURANCE CHECKS

BACKGROUND

57. Following the Government’s publication of the current version of the Rules, the Committee’s secretariat was asked by the Government to undertake a programme of informal compliance checks of departments’ arrangements for handling business appointment applications.

THE PROCESS

58. Given the resources available to both the secretariat and departments, the Committee felt it important to take a proportionate approach to the exercise. This required it to balance the requirement to obtain sufficient evidence to satisfy itself that the Rules were being properly managed by departments against a recognition that the resources were not available for an in-depth examination or audit of departmental compliance (nor was this what the Committee had been asked to undertake). The Committee also recognised the desirability of the process consisting of a combination of paper returns - and desk-based analysis - and visits to departments.

59. The Committee decided that the process should consist of three stages:

Stage one – all departments certifying whether they had complied with the Rules. The Secretariat sent a standard compliance certificate to the Permanent Secretary (or equivalent) of departments and executive agencies. The certificate asked for confirmation that the reputational and other risks associated with the movement of staff to other employers had been effectively managed, and that business appointment applications had been appropriately handled in accordance with Rules. Where departments were unable to provide this confirmation, we asked for a description of instances of non-compliance and details of action taken, or

planned, to deal with them. We also asked for the number of employees who had left Crown service, and their level of seniority, for the relevant period; the number of business appointments applications received; and the number of those approved with conditions.

Stage two – at the same time as being sent the compliance certificate referred to above, departments were sent a more detailed self-assessment questionnaire against the nine areas of compliance identified in the Rules (i.e. “Promoting Awareness...” etc) and informed that they might be asked to complete this for stage two of the compliance checks. The Committee subsequently decided that around ten percent of departments should be asked to complete the self-assessment.

Stage three – as a final stage, the Secretariat visited a smaller selection of departments to discuss their compliance with the Rules (and related issues) with the responsible officials – based on the departmental self-assessments, but in more depth. These departments were selected on the basis of the Committee’s desire to: visit all major departments at least once every three years; engage with departments with significant numbers of staff outside London; and engage with smaller and / or non-ministerial departments.

THE OUTCOME OF THE CHECKS

60. The checks indicated that the overwhelming majority of departments had satisfactory procedures in place to manage the business appointments process. Of the 92 departments and executive agencies consulted, very few identified areas of non-compliance. Where non-compliance was identified, it fell into two categories:

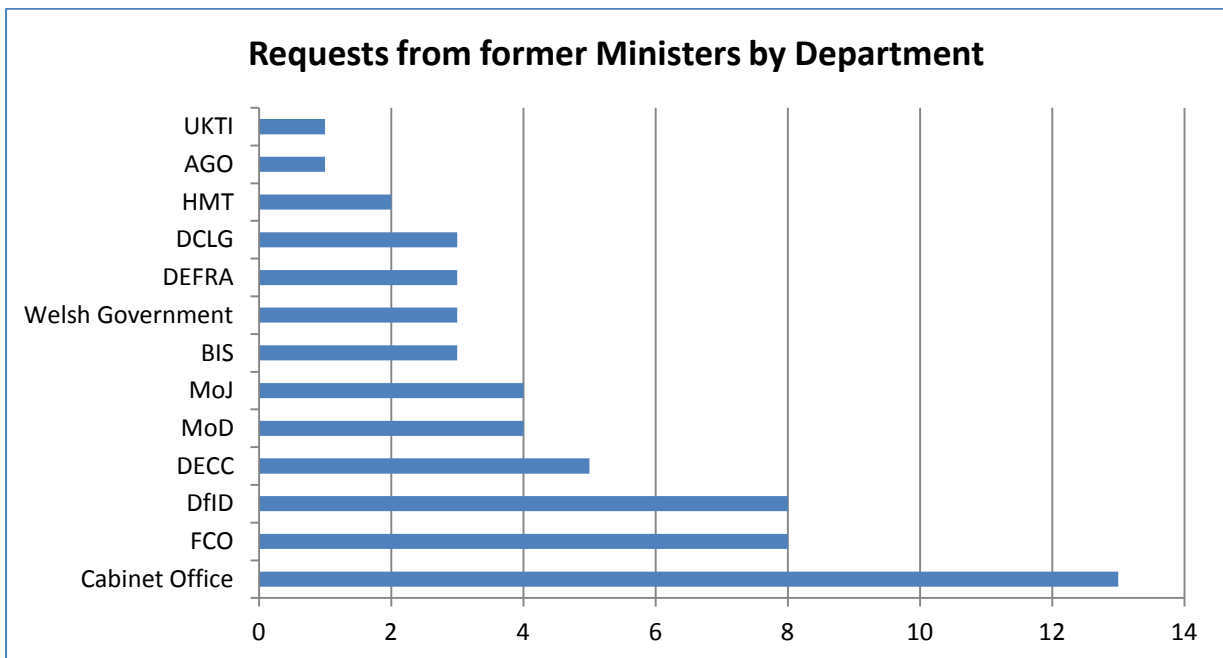
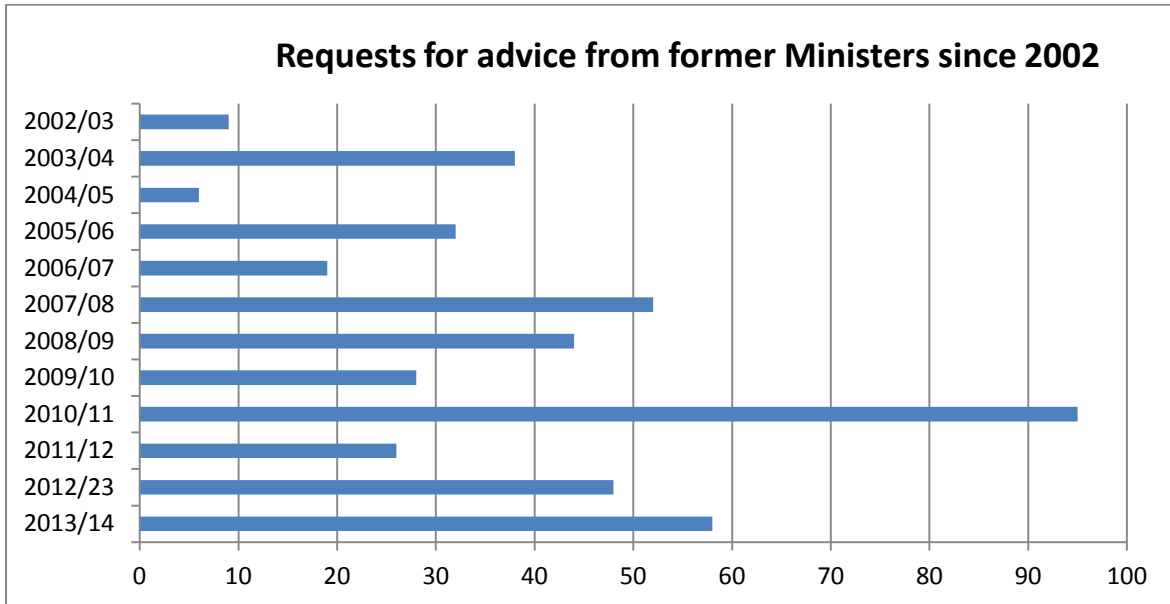
- an individual staff member had not complied with the Rules - usually by failing to make an application; or
- procedures in place within the department did not fully meet the requirements set out in the *Guidelines for*

Departments; either because the department had failed to bring the Rules to the attention of leavers; or it had not informed new employers and former colleagues of the outcome of applications and any restrictions imposed.

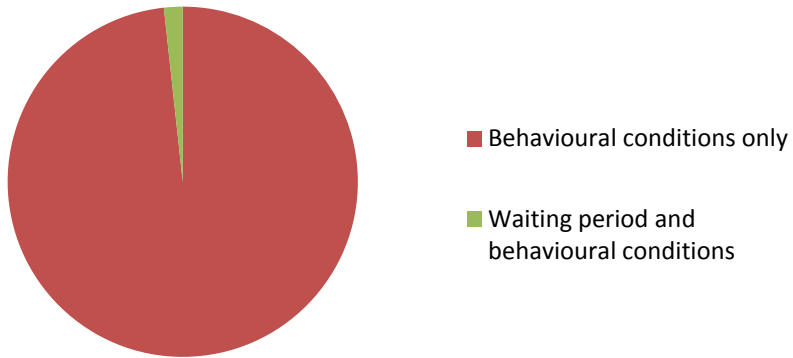
61. In all cases departments indicated how they intended to address areas of non-compliance. For example, reference to the Rules had been added to leavers' letters and included in exit interviews, and processes had been amended to ensure that staff were informed of conditions imposed on former colleagues.
62. Additionally, discussions with departments raised a number of related issues that the Committee feels it is worth noting here. These are as follows.
63. The level of seniority of departmental oversight of the process and the resource assigned to it varied markedly between departments. Departments with a relatively large HR function might have a relatively small SCS cohort. The reverse could also be the case, and it was in the latter category where there appeared to be the most strain on resources in terms of handling business appointment applications.
64. The ease with which employees could access the Rules and how (and how frequently) they were made aware of them varied between departments. The user-friendliness of departmental intranets varied, for example, and departments had different processes for bringing the Rules to the attention of leavers.
65. The type of risk generally associated with the business appointments of former employees varied from department to department. In some cases the risk was associated with the department being a large-scale procurer of materiel; in other cases it might be in direct competition with the private sector to provide services; or it might be that certain employees were unusually well-placed to build up networks of contacts whilst in Crown service. These risks needed to be managed differently and required varying conditions to be imposed on applicants.
66. It could be difficult for departments to know with certainty how many (if any) individuals were failing to submit applications when they should, or to comply with conditions imposed. However, some departments had taken steps to mitigate this risk by, for example, making current employees aware of restrictions imposed on their former colleagues, to underpin any lobbying bans.
67. Some felt that, because of the nature of appointments often taken up by former Crown servants, including unpaid, part-time, appointments, the Rules could appear disproportionate. Conversely, others felt it was important that the Rules continued to include unpaid appointments, as propriety issues could equally arise in connection with them.
68. There was a potential tension between the Rules and the Government's stated aim of encouraging greater movement between the civil service and the private sector. Related to this was the further concern that emphasising the Rules too vigorously before and during the recruitment of people from outside the civil service could deter potential applicants.

ANNEX A

MINISTERS



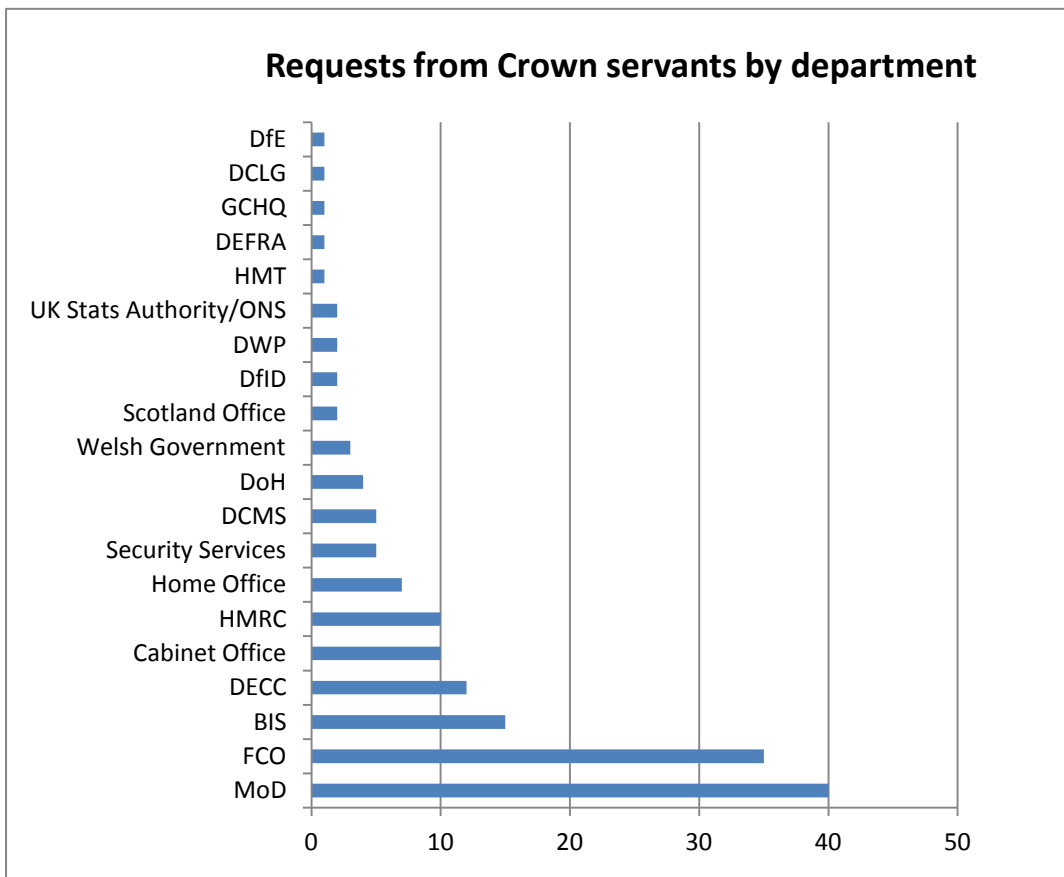
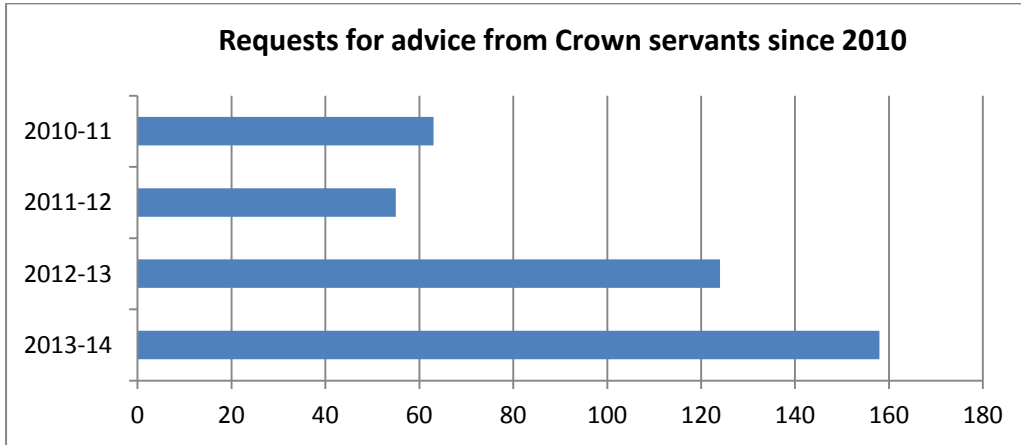
Summary of behavioural conditions for former Ministers



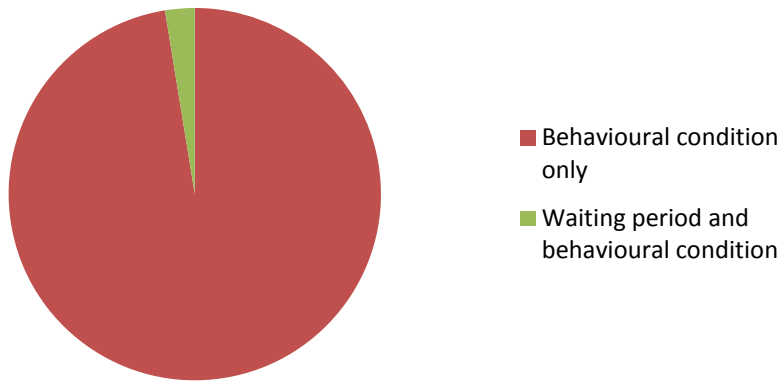
NB: No appointments of former Ministers were approved unconditionally in 2013/14

ANNEX B

CROWN SERVANTS



Summary of behavioural conditions imposed on former Crown servants



NB: No appointments of former Crown servants were approved unconditionally in 2013/14

Annex C

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 ADVICE³

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.

⁴ 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 D

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.

Leighton Andrews Former Minister for Education and Skills, Welsh Government	
Left office	June 2013
Columnist, Golwg	
Took up new appointment	September 2013
<p>Mr Andrews sought permission to take up an unpaid, part-time position as a columnist with Golwg, a Welsh language magazine.</p> <p>When considering this application, the Committee noted that Mr Andrews had had official dealings with Golwg whilst in office, but that these had only been through interviews. The Committee took into account the fact that a grant had been awarded to Golwg by the Welsh Government, but that this had not come from Mr Andrews's former Department. The Committee further considered the fact that this role would be unpaid.</p> <p>The Committee advised Mr Andrews that it saw no reason why he should not take up the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - he should not draw on any privileged information available to him as a Minister; and - for two years from his last day in ministerial office, Mr Andrews should not become personally involved in lobbying the Welsh Government on behalf of his new employer, its parent company or its clients. 	
Date of approval Approval letter	July 2013
Dictionary of Welsh Biography	
Took up new appointment	March 2014
Leighton Andrews sought the Committee's advice about accepting a role as Board Member for the	

<p>Dictionary of Welsh Biography.</p> <p>When considering the application the Committee took into account that he had contact with the organisation funding this project, the National Librarian to groups looking at the use of digital resources in schools and higher education. The Committee further noted that the Permanent Secretary's office did not see any propriety issues with this application.</p> <p>The Committee advised Mr Andrews that it saw no reason why he should not take up the appointment subject to the conditions that:</p> <ul style="list-style-type: none"> - that he should not draw on any privileged information available to you as a Minister; and - for two years from his last day in ministerial office, he should not become personally involved in lobbying the Welsh Government on behalf of his new employer, its parent company or its clients. 	
<p>Date of approval Approval letter</p>	<p>February 2014</p>
<p>Henry Bellingham Former Parliamentary Under-Secretary of State, Foreign and Commonwealth Office</p>	
<p>Left office</p>	<p>September 2012</p>
<p>Non-Executive Director, Developing Markets Limited</p>	
<p>Took up new appointment</p>	<p>May 2013</p>
<p>Mr Bellingham sought permission to accept a position as a part-time Non-Executive Director of Developing Markets Associates Ltd (DMA). The role would involve working across emerging markets providing strategic advice, chairing conferences and providing introductions.</p> <p>The Committee took into consideration the fact that Mr Bellingham had had official dealings with his prospective employer whilst in Government. However, the Committee noted that Mr Bellingham had been unaware of any relationship between his former Department and DMA and had had no official dealings with any competitors. It further took into account the fact that it had been seven months since Mr Bellingham left office.</p> <p>The Committee advised Mr Bellingham that it saw no reason why he should not take up the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - Mr Bellingham should not draw on any privileged information available to him from his time in Government; and - Mr Bellingham should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients for two years from his last day in office. 	
<p>Date of approval Approval letter</p>	<p>May 2013</p>

Non-Executive Director, Pontus Marine Ltd	
Took up new appointment	June 2013
<p>Mr Bellingham sought permission to accept a part-time, paid appointment as a Non-Executive Director of Pontus Marine Ltd, a commercial fisheries company operating off the coast of the Horn of Africa and in the Gulf of Aden. This role would involve providing good governance and strategic direction to the Board, and ensuring adherence to the Combined Code on Corporate Governance.</p> <p>When considering this application the Committee took into account the fact that Mr Bellingham had met with the Chief Executive of Pontus Marine Ltd on occasion whilst in office. However, the Committee noted that this individual was a contact Mr Bellingham had made prior to taking up office. The Committee further took into account that Mr Bellingham had had no official dealings with any competitors of Pontus Marine Ltd whilst in Government; nor had he been aware of any relationship between Pontus Marine Ltd and his former Department.</p> <p>The Committee advised Mr Bellingham that it saw no reason why he should not take up the appointment forthwith, subject to the conditions that:</p> <ul style="list-style-type: none"> - Mr Bellingham should not draw on any privileged information available to him from his time in Government; and - Mr Bellingham should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients for two years from his last day in office. 	
Date of approval Approval letter	June 2013
Non-Executive Chairman, Pathfinder Minerals Ltd	
Took up new appointment	February 2014
<p>Mr Bellingham sought advice from the Committee to take up a part-time, paid appointment as Non-Executive Chairman of Pathfinder Minerals Ltd.</p> <p>When considering this application the Committee took into account that Mr Bellingham met Pathfinder Minerals on one occasion whilst he was in office; and subsequently wrote to the Government of Mozambique supporting the company in an ongoing legal dispute it is involved in that country. The Committee noted that this activity was in the normal course of your ministerial duties.</p> <p>The Committee advised Mr Bellingham that it saw no reason why he should not take up the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - he should not draw on any privileged information available to him from his time in Government; and - he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients for two years from his last day in office. 	
Date of approval Approval letter	February 2014
Rt Hon Richard Benyon MP	

Former Parliamentary Under-Secretary of State for Natural Environment and Fisheries	
Left office	October 2013
Director and Chairman of the Board of Director's of the Englefield Estate Trust Corporation Limited	
Took up new appointment	December 2013
<p>Mr Benyon sought the Committee's advice about accepting a part-time, unpaid role as Director and Chairman of the Board of Directors of the Englefield Estate Trust Corporation Limited.</p> <p>The Committee took into account that he was formerly a Director of the Englefield Estate Trust. The Committee further took into account that you did not have any direct official dealings with his prospective employer during your 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.</p> <p>The Committee advised Mr Benyon that it saw no reason why he should not take up the appointment, subject to that condition 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.</p>	
Date of approval Approval Letter	November 2013
Crispin Blunt Former Under-Secretary of State for Justice, Ministry of Justice	
Left office	September 2012
Consultant, Ethos Capital Advisors	
Took up new appointment	June 2013
<p>Mr Blunt sought permission to accept a part-time appointment as a Consultant with Ethos Capital Advisors Ltd, which provides advice to investors on derivatives and structured financial products.</p> <p>When considering this application, the Committee took into account the fact that Mr Blunt had had no official dealings with his prospective employers or their competitors while in office.</p> <p>The Committee advised Mr Blunt that it saw no reason why he should not take up the appointment forthwith, on the understanding that he would not draw on privileged information, and subject to the following conditions:</p> <ul style="list-style-type: none"> - for two years from the date of leaving office, Mr Blunt should not advise on the terms of any bid or contract related to the work of the MOJ; and - for two years from the date of leaving office, Mr Blunt should not become personally involved 	

in lobbying UK Government on behalf of his new employer, its parent company or their clients.	
Date of approval Approval letter	June 2013
Consultant, Mr Harish Mehta	
Took up new appointment	July 2013
<p>Mr Blunt sought permission to accept a part-time appointment as a Consultant with Mr Harish Mehta. Mr Blunt would initially be providing government relations, public affairs and corporate finance advice to Mr Mehta and his group of companies regarding a major road project in the Balkans.</p> <p>When considering this application, the Committee took into account the fact that Mr Blunt had had no official dealings with his prospective employer or any competitors in his ministerial capacity.</p> <p>The Committee advised Mr Blunt that it saw no reason why he should not take up the appointment forthwith, subject to the conditions that:</p> <ul style="list-style-type: none"> - Mr Blunt should not draw on any privileged information available to him from his time in Government; and - for two years from the date of leaving office, he should not become personally involved in lobbying UK Government on behalf of his new employer, its parent company or their clients. 	
Date of approval Approval letter	July 2013
Non-executive board member for the Council for Arab-British Understanding	
Took up new appointment	January 2014
<p>Mr Blunt sought the Committee's advice on taking up a part time, unpaid role as Non Executive Director for the Council for Arab-British Understanding (CAABU).</p> <p>Mr Blunt's role will be to help oversee a small organisation and promote its policy programme. The Committee noted that he had no dealings with competitors of CAABU, nor did he have access to commercially sensitive information about any competitors.</p> <p>The Committee advised Blunt that it saw no reason why he should not take the post forthwith, subject to the conditions that:</p> <ul style="list-style-type: none"> - that you should not draw on any privileged information available to you as a Minister; and - for two years from your last day in ministerial office, you should not become personally involved in lobbying the Ministry of Justice on behalf of your new employer or its clients. 	
Date of Approval Approval letter	November 2013
Rt Hon Alistair Burt MP Foreign and Commonwealth Office	

Left office	October 2013
Independent Consultant	
<p>Alistair Burt, the former Parliamentary under Secretary of State at the Foreign & Commonwealth Office, Mr Burt sought the Committee's permission to set up as an independent consultant and to undertake a commission.</p> <p>The Committee noted that his consultancy will provide advice orally and/or in writing, to assist with overall appreciation and understanding of the economic and political environments in various countries.</p> <p>The Committee advised Mr Burt that his that it saw no reason why he should not take up the the consultancy and commission subject to the conditions that:</p> <ul style="list-style-type: none"> - 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, Mr Burt should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of any bid or contract relating directly to the work of his former Department, the FCO; - for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his new company or its clients; and - once he has received approval to set up as an independent consultant, for two years from his last day in ministerial office he must seek confirmation from the Committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application. <p>Commission</p> <p>PLLG Investment Advisors Limited - February 2014 Global GSA Group BV - June 2014</p>	
Date of approval Approval letter	January 2014
<p>Sir Edward Garnier Former Attorney General for England and Wales</p>	
Left Office	September 2013
DLA Piper	
Took up new appointment	January 2014
<p>Sir Edward sought the Committee's advice to accept a retainer with DLA piper.</p> <p>The Committee took into account that he did not have any direct official dealings with his prospective employer during his last two years in office. Furthermore, Sir Edward did not have access to commercially sensitive information about any competitors. The Committee also noted that the fact it now</p>	

sixteen months since he left ministerial office.

The Committee advised Sir Edward that is saw no reason why he should not take the post forthwith, subject to the conditions that:

- that he should not draw on any privileged information available to him as a Minister; and
- for two years his your last day in ministerial office, you 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 Approval letter	January 2014
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Charles Hendry
Former Minister for Energy, Department for Energy and Climate Change

Left Office	September 2012
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Consultant for Vitol Services Ltd

Appointment taken up	February 2014
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Mr Hendry sought the permission to accept an offer of employment as a Consultant for Vitol Services Ltd.

When considering this application, the Committee took into account the fact that Mr Hendry did have some contact with Vitol while in office, but that this was through DECC’s ongoing industry engagement, and that he had similar dealings with other leading firms. They further considered the fact that Vitol were involved in discussions with DECC at the time of the closure of the Coryton refinery and, although most discussions were handled at an official level, he had a couple of phone conversations with the company. However, the Committee considered the Department’s view that his appointment with Vitol does not raise any propriety concerns from their perspective.

The Committee advised Mr Hendry that is saw no reason why he should not take the post forthwith, subject the conditions that:

- that he should not draw on any privileged information available to him as a Minister or in his capacity as a Trade Envoy;
- he should make it clear in any activities he undertakes on behalf of his new employer, its parent company or its clients, that he is acting as their representative and not as a Government representative; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.

Date of Approval Approval Letter	January 2014
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Sir Gerald Howarth MP

Minister for International Security Strategy	
Left office	September 2012
Consultant, CNU Online Holdings LLC (ENOVA)	
Took up new appointment	June 2013
<p>Sir Gerald sought permission to accept a part-time, paid role as a consultant with ENOVA. ENOVA is a global financial service provider, it offers a variety of online credit products to people all over the world, including the United Kingdom.</p> <p>When considering the application, the Committee took into account that Sir Gerald had no direct official dealings with the company in his ministerial capacity. Furthermore, he had no dealings with any competitors of the company during his last two years in office. The Committee also noted that he did not have access to commercially sensitive information about any competitors.</p> <p>The Committee advised Sir Gerald that it saw no reason why he should not take up the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - that he should not draw on any privileged information available to him as a Minister; and - 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, their parent companies or their clients. 	
Date of approval Approval letter	June 2013
Consultant, Sigma Energy Limited	
Took up new appointment	July 2013
<p>Sir Gerald sought advice from the Committee about accepting a part-time, paid appointment as a consultant for SIGMA Energy Limited. Sigma operates in the renewable fuel sector and is focused on the production of biomass based fuels from agriculture sources. His responsibilities will be to provide strategic advice, and advice on regulatory environment relating to the biomass industry, as well as political trends.</p> <p>The Committee took into account that he had no direct office dealing with his prospective employer in his ministerial capacity. The Committee also noted that he did not have access to commercially sensitive information about any competitors.</p> <p>The Committee advised Sir Gerald that it saw no reason why he should not take the post forthwith, subject to the conditions that: -</p> <ul style="list-style-type: none"> - that he should not draw in any privileged information available to him as Minister; and - for two years from your last day in office, he should not become personally involved in lobbying UK 	

Government on behalf of your new employers, their parent companies or their clients.	
Date of approval Approval letter	June 2013
The Rt Hon the Lord Howell of Guildford Former Minister of State, Foreign and Commonwealth Office	
Left Office	September 2012
Chairman, Commonwealth Exchange	
Took up new appointment	July 2013
<p>Lord Howell sought permission to accept an unpaid appointment as Chairman of the Commonwealth Exchange, working one day per month.</p> <p>When considering this application, the Committee took into account that Lord Howell had not had official dealings with his prospective employer or any competitors. The Committee noted that the Commonwealth Exchange is a new, non-political think tank, which is applying for registration as a charitable organisation.</p> <p>The Committee advised Lord Howell that it saw no reason why he should not take up the appointment forthwith, on the understanding that he should not draw on any privileged information available to him from his time in Government (including in his former capacity as personal adviser to the Foreign Secretary) and subject to the condition that:</p> <p>- for two years from his last day in office, Lord Howell should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.</p>	
Date of approval Approval letter	July 2013
President, Royal Commonwealth Society	
Took up new appointment	August 2013
<p>Lord Howell sought permission to accept a part time, unpaid role as President of the Royal Commonwealth Society (RCS).</p> <p>When considering this application, the Committee took into account that Lord Howell had dealings on Commonwealth issues in his role as Minister of State at the FCO, but that this had no direct connection to the work of the RCS. The Committee noted that Lord Howell was not aware of any relationship between the RCS and his former Department and that he had not had any official dealings with any competitors (albeit the RCS does not have competitors in the usual sense).</p> <p>The Committee advised Lord Howell that it saw no reason why he should not take up the</p>	

<p>appointment forthwith, on the understanding that he should not draw on privileged information from his time in Government (including in his earlier capacity as personal adviser to the Foreign Secretary on energy and resource security), and subject to the condition that:</p> <p>- for two years from his last day of service, Lord Howell should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.</p>	
<p>Date of approval Approval letter</p>	<p>July 2013</p>
<p>The Rt Hon Chris Huhne Former Secretary of State, Department for Energy and Climate Change</p>	
<p>Left Office</p>	<p>February 2012</p>
<p>Chairman, Europe, Zilkha Biomass Energy</p>	
<p>Took up new appointment</p>	<p>August 2013</p>
<p>Mr Huhne sought advice on accepting a position as Chairman, Europe for Zilkha Biomass Energy (ZBE), a company supplying renewable energy, working two days per week.</p> <p>When considering this application, the Committee took into account the fact that Mr Huhne had met with ZBE during his last two years in office. However, this meeting had been for ZBE to brief officials and provide information, and had not included any request for finance or policy exchange. The Committee noted that Mr Huhne had not been involved in the development of policy, award of grants, or regulatory work that might have impacted on ZBE. It also took into account that Mr Huhne was not aware of any contractual relationship between his former Department and ZBE and had had no access to commercially sensitive information about any competitors.</p> <p>The Committee advised Mr Huhne that, as he had left office 16 months earlier and was no longer subject to the usual three month waiting period, it saw no reason why he should not take up this appointment forthwith, subject to the conditions that:</p> <p>- he should not draw on any privileged information available to him as a Minister; and</p> <p>- 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.</p>	
<p>Date of approval Approval letter</p>	<p>July 2013</p>
<p>Columnist, Guardian</p>	
<p>Took up new appointment</p>	<p>September 2013</p>
<p>Mr Huhne sought advice on accepting a part-time position as a columnist with the Guardian.</p>	

When considering this application the Committee noted that Mr Huhne had had official dealings with the Guardian whilst in office, but that these had comprised of briefings, which had also been provided to all other major national newspapers. The Committee also noted that Mr Huhne was not aware of any contractual relationship between his prospective employer and his former Department. The Committee further took into account that Mr Huhne had been a columnist with the Guardian between 1980 and 1990.

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

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

Date of approval Approval letter	July 2013
Sir Peter Luff Former Minister for Defence Equipment, Support and Technology, Ministry of Defence	
Left office	September 2012
Non Executive Director, Parity Group Plc	
Took up new appointment	September 2013
<p>Sir Peter sought the Committee's advice on taking up a paid appointment, as a non executive director for the Parity Group.</p> <p>Sir Peter's role as non executive director will be to offer advice and guidance at board meetings, and between meetings, to executive directors.</p> <p>The Committee noted that Parity Group did have some contracts with his former department. The Committee observed that these contacts were of relatively small size amounting to less than three percent of the Group's turnover.</p> <p>The Committee advised Sir Peter that it saw no reason why he should not take up the post forthwith, subject to the conditions that:</p> <ul style="list-style-type: none"> - he should not draw on any privileged information available to him from his time in Government; - for two years from his last day in office, Sir Peter should not advise on the terms of any bid or contract relating to the work of MOD; and - 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. 	
Date of approval	August 2013

Approval letter	
Chairman of the British Shooting Sports Council	
Date of announcement	March 2014
<p>Sir Peter Luff sought the Committee's advice on a part-time, unpaid, appointment, as Chairman of the British Shooting Sports Council (BSSC).</p> <p>The Committee noted that the BSSC is an umbrella body which brings together the UK's twelve major shooting associations to achieve consensus positions on political and legislative issues affecting the shooting sports. As such, its member organisations – rather than the BSSC - tend to undertake any representational work required in support of the objectives of the shooting world. The Committee further noted that you had no dealings with the BSSC, nor any competitors, during his last two years in office, nor does his former department have any contractual or non-contractual relationship with the organisation.</p> <p>The Committee advised Sir Peter that it saw no reason why h should not take up the appointment 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 the BSSC.</p>	
Date of approval Approval letter	January 2014
Lord Marland of Odstock Former Parliamentary Under-Secretary, Department for Business, Innovation and Skills	
Left office	January 2013
Non-Executive Director, Three Jays Limited	
Took up new appointment	July 2013
<p>Lord Marland sought permission to take up a part-time, unpaid appointment as a Non-Executive Director for Three Jays Limited, an investment company.</p> <p>When considering this application the Committee took into account the fact that Lord Marland had had no official dealings with his prospective employer or its clients and had not had access to commercially sensitive information about any competitors.</p> <p>The Committee advised Lord Marland that it saw no reason why should not take up the post forthwith, subject to the conditions that:</p> <ul style="list-style-type: none"> - 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 employers 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 employers or their clients.	
Date of approval Approval letter	June 2013
Director/Chairman, Commonwealth Business Council	
Took up new appointment	1 January 2014
<p>Lord Marland sought permission to accept a part time, paid appointment as Director/Chairman for the Commonwealth Business Council.</p> <p>The Committee took into account he had limited official dealings with his prospective employer. The Committee noted that these dealing were in the normal course of his ministerial duties.</p> <p>The Committee also noted that it is 11 months since he left office.</p> <p>The Committee advised Lord Marland that is saw no reason why he should not take the post forthwith, subject to the conditions that:</p> <ul style="list-style-type: none"> - that he does not draw on privileged information available to him as a Minister or in your role as the Prime Minister’s Trade Envoy; - he makes it clear in any activities you undertake on behalf of his new employers that he is acting as their representative and not as a Government representative; and - for two years from his last day in UK Government, in lobbying the UK Government, he does not promote the particular interests of Herriot Ltd, Tamara Mellon, or Three Jays Ltd. 	
Date of Approval Approval letter	December 2013
Director, Test Match Extra.Com Limited	
Took up new appointment	January 2014
<p>Lord Marland sought the Committee’s advice on taking up a part time appointment with Test Match Extra.Com.</p> <p>The Committee noted that he had no official dealings with his prospective employer or its clients. The Committee also noted that it is over twelve months since Lord Marland left office.</p> <p>The Committee advised Lord Marland that is saw no reason why he should not take the post forthwith, subject the conditions that:</p> <ul style="list-style-type: none"> - that you should not draw on any privileged information available to you as a Minister; or as the Prime Minister’s Trade Envoy; and - for two years from your last day in ministerial office, you should not become personally involved in lobbying the Ministry of Justice on behalf of your new employer or its clients 	
Date of Approval	January 2014

Approval letter	
Lord McNally Former Minister of State for Justice	
Left office	December 2013
Chair, Youth Justice Board	
Appointment announced Appointment to be taken up	December 2013 March 2014
<p>Lord McNally sought permission to accept a position as Chair of the Youth Justice Board (YJB).</p> <p>When considering this application, the Committee took into account the fact that the YJB is sponsored by the Ministry of Justice and delivers/commissions youth justice services alongside it. The Committee noted that Lord McNally has made contributions to ministerial decisions relating to the YJB, but that he has not been the lead Minister on this.</p> <p>The Committee also took into account the fact that Lord McNally thought it best to observe a three month waiting period between stepping down as a Minister and taking up the new position with the YJB. They noted that this was not suggested due to any conflict of interest arising from the appointment (as he had applied for an advertised appointment, regulated by the Commissioner for Public Appointments), but as a way to create a clear gap between the two roles.</p> <p>Taking into account the strong public interest in allowing Lord McNally to lobby Government on issues that benefit youth justice, the Committee advised him that it saw no reason why he should not take up the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - he observe a waiting period of three months from his last day in ministerial office; - he should not draw on any privileged information available to him from his time in Government; and - for two years from his last day in office, he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients on any matters not related to youth justice. 	
Date of approval Approval letter	November 2013
The Rt Hon Andrew Mitchell Former Government Chief Whip	
Left Office	October 2012
Senior Advisor, East End Foods	

Appointment taken up	September 2013
<p>Mr Mitchell sought permission to take up an appointment as a Senior Advisor to East End Foods (EEF).</p> <p>When considering this application, the Committee noted that Mr Mitchell had had some contact with EEF in his constituency work, and had visited their factory in 2008. However, it also noted that Mr Mitchell had not had any contractual dealings with EEF in his last two years in office, had not had dealings with any competitors, and had not been involved in any policy or decisions that could have affected EEF.</p> <p>The Committee advised Mr Mitchell that he could take up the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - he should not draw on any privileged information available to him as a Minister; and - for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his new employers or its clients. 	
Date of approval Approval letter	September 2013
Senior Advisor, Investec	
Appointment taken up	October 2013
<p>Mr Mitchell sought advice on accepting a position as a Senior Advisor to Investec.</p> <p>When considering this application, the Committee took into account that Mr Mitchell had not had any direct official dealings with Investec and that this role would not involve any lobbying of Government. The Committee noted that Mr Mitchell did have occasional, incidental contact with competitors of Investec as a Minister, but that this had been through the course of his ministerial duties at meetings/receptions.</p> <p>The Committee advised Mr Mitchell that it saw no reason why he should not take up the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - he should not draw on any privileged information available to him as a Minister; and - for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his new employers or its clients. 	
Date of approval Approval letter	September 2013
Robert Neill Former Parliamentary Under-Secretary of State, Department for Communities and Local Government	
Left Office	September 2012

The London School of Business	
Took up new appointment	April 2014
<p>Mr Neill sought the Committee’s advice about taking up a part-time, paid appointment as a lecturer at the London School of Business and Finance.</p> <p>The Committee advised Mr Neill that it saw no reason why he should not take up the appointment forthwith, subject to the following conditions:</p> <p>- he should not draw on any privileged information available to him from his time in Government; and</p> <p>- he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients for two years from his last day in office.</p>	
Date of approval Approval letter	March 2014
<p>Rt Hon Stephen O'Brien MP Prime Minister's Envoy and Special Representative for the Sahel at the Foreign & Commonwealth Office</p>	
Left office	September 2012
Global Advocate for Roll Back Malaria	
Took up new appointment	May 2013
<p>Stephen O'Brien MP sought permission to accept an unpaid role as Global Advocate for Roll Back Malaria (RBM), part of the World Health Organisation, working 15-20 days per year. The role was offered to Mr O'Brien by RBM once he left his ministerial post due to his previous work and personal commitment on the issue, which had been in an unremunerated and voluntary capacity.</p> <p>When considering the application the Committee noted that Mr O'Brien had met with RBM on a number of occasions while in office, and that DFID and RBM have a contractual relationship, but one below the threshold that Mr O'Brien would have had sight of. However, the Committee also noted that Mr O'Brien had left office seven months earlier and that the proposed role was unpaid.</p> <p>Taking into account all the circumstances, the Committee advised Mr O'Brien that he could accept the appointment with RBM, subject to the conditions that:</p> <p>- Mr O'Brien 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;</p> <p>- Mr O'Brien 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</p> <p>- for two years from his last day in office, Mr O'Brien should not become personally involved in</p>	

lobbying the UK Government on behalf of his new employer, its parent company or its clients on any matters not related to the fight against malaria.

Date of Approval Approval letter	May 2013
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Independent Consultancy

Took up new appointment	March 2014
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Non Executive Director - S4Si Limited

Took up new appointment	January 2014
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Stephen O'Brien MP, sought the committee's advice about the following:

- 1) A part time, paid appointment as Non Executive Director for S4Si; and
- 2) Setting up a general consultancy (OBSERVE Ltd) and commissions with Montrose International LLP and S4Si.

The Committee advised Mr O'Brien that his that it saw no reason why he should not take up the appointment as a Non Executive Director for S4Si forthwith, subject to the following conditions:

- that for the duration of your consultancy, he should not undertake any duties that involve advising on the terms of any bid or contract relating to the work of DFID;

- he should not draw on any privileged information available to him from his time in Government including your current capacity as the Prime Minister's Envoy and Special Representative; and

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

Furthermore, the Committee advised Mr O'Brien that they he could establish his independent consultancy, OBSERVE Ltd (to provide advice to international business clients on strategy, corporate governance, business administration, finance, sales, listing and associated matters), and accept the commissions with Montrose International LLP and S4Si, subject to the following conditions:

- he should not draw on any privileged information available to him from his time in Government including your current capacity as the Prime Minister's Envoy and Special Representative;

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

- once he has received approval to set up as an independent consultant, for two years from his last day of service you 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

S4SI Limited

Montrose International LPP Global Strategy Limited	
Date of approval Approval letter	January 2014
Rt Hon Sir James Paice MP Former Minister of State, Defra	
Left Office	September 2012
Non-Executive Chairman, First Milk Ltd	
Appointment announced Takes up new appointment	August 2013 November 2013
<p>Sir Jim sought permission to take up a role as Non-Executive Chairman of First Milk Ltd.</p> <p>When considering this application, the Committee took into account Sir Jim's official dealings with First Milk whilst in office, but noted that these were mainly through their attendance at the Dairy Supply Chain Forum, where representatives of several competitors were also present. The Committee took into account Sir Jim's involvement with the UK dairy sector, but noted that his relationship with First Milk had been no different to with other dairy organisations. The Committee also noted that Sir Jim was not aware of any contractual relationship between Defra and First Milk, that he had not had access to commercially sensitive information about competitors, and that he had left office 11 months earlier.</p> <p>The Committee noted with concern that, due to a leak, Sir Jim's appointment was announced before it could provide its advice. However, taking into account all the circumstances, the Committee was content to approve the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - Sir Jim should not draw on any privileged information available to him as a Minister; and - for two years from his last day in ministerial office, Sir Jim should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients. 	
Date of approval Approval letter	August 2013
Non Executive Director, Camgrain	
Appointment announced	October 2013
<p>Sir Jim sought permission to accept a position as a Non Executive Director for Camgrain, a farmer-owned cooperative, storing and managing grain for its members.</p> <p>When considering this application, the Committee took into account the fact that Sir Jim did have</p>	

dealings with Camgrain during his time in office, but that these had been undertaken as a constituency MP and not as a Minister. The Committee noted that Camgrain had received grants from the Rural Development Programme for England during Sir Jim's time in office, but that there had been no ministerial involvement in these.

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

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

Date of approval Approval letter	October 2013
Rt Hon Michael Prisk MP Former Minister for Housing at the Department for Communities and Local Government (DCLG)	
Left Office	October 2013
Adviser, Essential Living Ltd.	
Took up new appointment	June 2014
<p>Mark Prisk MP sought the Committee's advice about taking up a part-time, paid appointment as an adviser to Essential Living, a private sector rented property developer.</p> <p>The Committee noted that Mr Prisk's role would involve advising on current and upcoming laws which affect the private rented sector, providing strategic advice on broader housing policy, supporting the progression of individual sites and assisting Essential Living to establish a recognisable brand.</p> <p>The Committee advised Mr Prisk that his application is approved subject to the following conditions:</p> <ul style="list-style-type: none"> - he should not draw on any privileged information available to him from his time in Government; and -he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients for two years from his last day in office 	
Date of approval Approval letter	April 2014
The Rt Hon Lord Sassoon Kt Former Commercial Secretary to the Treasury, HM Treasury	
Left Office	January 2013

Member of Global Advisory Board, Mitsubishi UFJ Financial Group	
Took up new appointment	July 2013
<p>Lord Sassoon sought advice on accepting a part-time, paid appointment as a member of the Global Advisory Board with Mitsubishi UFJ Financial Group (MUFG).</p> <p>When considering this application the Committee noted that he had had no official dealings with his proposed employer whilst in office. Furthermore, his proposed role would involve no lobbying of the UK Government.</p> <p>The Committee advised Lord Sassoon that it saw no reason why he should not take up the appointment forthwith, subject to the following conditions:</p> <ul style="list-style-type: none"> - 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, its parent company or its clients. <p>Sir Hugh Stevenson recused himself as he is a friend of Lord Sassoon.</p>	
Date of approval Approval letter	May 2013
Trustee to the British Museum	
Took up new appointment	September 2013
<p>Lord Sassoon sought permission to accept a part-time, unpaid appointment, returning to a position as a Trustee of the British Museum (BM). When considering this application the Committee took into account the fact that, whilst in Government, Lord Sassoon frequently attended BM events in his capacity as a patron and former Trustee. The Committee noted that the Department for Culture, Media and Sport is the sponsoring department for the BM, but that, as a publicly funded body, the BM will have regular contact with the Treasury. However, the Committee noted that Lord Sassoon had not had responsibility for the Treasury's culture spending team.</p> <p>The Committee advised Lord Sassoon that it saw no reason that why he should not take up the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - he should not draw on any privileged information available to him as a Minister; and - for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients. <p>Sir Hugh Stevenson recused himself as he is a friend of Lord Sassoon.</p>	

Date of approval Approval letter	August 2013
Rt Hon Lord Shutt of Greetland Former Captain of the Queen's Bodyguard of the Yeoman of the Guard and Deputy Chief Whip, House of Lords	
Left office	May 2012
Trustee, Pennine Heritage	
Took up new appointment	September 2013
<p>Lord Shutt sought advice on accepting a role as a trustee of Pennine Heritage, a charity promoting the Yorkshire/Lancashire South Pennines, a position which he held prior to taking up ministerial office.</p> <p>When considering this application the Committee noted that it had been 14 months since Lord Shutt left ministerial office. They also considered the fact that he had had no direct official dealings with his prospective employers, or with any competitors, in his ministerial capacity, and was not aware of any relationship between his prospective employer and former Department.</p> <p>The Committee advised Lord Shutt that it saw no reason why he should not take up the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - he should not draw on privileged information available to him as a Minister; and - for two years from his last day in ministerial office, Lord Shutt should not become personally involved in lobbying the UK Government on behalf of his new employers or their clients. 	
Date of approval Approval letter	July 2013
Director, X-Pert Health Training and Education Ltd	
Took up new appointment	September 2013
<p>Lord Shutt sought advice on accepting a position as Director of X-Pert Health Training and Education Ltd (XPHE).</p> <p>When considering this application, the Committee noted that Lord Shutt had previously been Chairman of XPHE, a position which he had resigned when he took up ministerial office. The Committee took into account the fact that it had been 14 months since Lord Shutt left ministerial office. They also considered the fact that he had had no direct official dealings with his prospective employers, or with any competitors, in his ministerial capacity, and was not aware of any relationship between his prospective employer and former Department.</p>	

<p>The Committee advised Lord Shutt that it saw no reason why he should not take up the appointment, subject to the conditions that:</p> <ul style="list-style-type: none"> - he should not draw on privileged information available to him as a Minister; and - for two years from his last day in ministerial office, Lord Shutt should not become personally involved in lobbying the UK Government on behalf of his new employers or their clients. 	
<p>Date of approval Approval letter</p>	<p>July 2013</p>
<p>Lord Strathclyde Former Leader of the House of Lords</p>	
<p>Left Office</p>	<p>January 2013</p>
<p>Senior Adviser - URS Corporation</p>	
<p>Took up new appointment</p>	<p>June 2013</p>
<p>The Advisory Committee on Business Appointments has received an approach from Lord Strathclyde for advice about accepting a part time, paid appointment as a Senior Adviser to the URS Corporation.</p> <p>URS is a leading provider of engineering, construction and technical services for public agencies and private sector companies around the world.</p> <p>When considering the application the Committee took into account that 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 four months since he left ministerial office.</p> <p>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.</p> <p>The Committee advised Lord Strathclyde, that it saw no reason why he should not take up the appointment subject to:</p> <ul style="list-style-type: none"> - 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, you should not become personally involved in lobbying the UK Government on behalf of your his employer or its clients. 	
<p>Date of Approval Approval Letter</p>	<p>June 2013</p>
<p>Senior Adviser - Battersea Power Station</p>	

Took up new appointment	June 2013
<p>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).</p> <p>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.</p> <p>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.</p> <p>The Committee saw no reason why he should not accept this appointment forthwith subject to the following conditions:</p> <ul style="list-style-type: none"> - 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 Approval Letter	June 2013
Adviser - JC Bamford Excavators	
Took up new appointment	November 2013
<p>Lord Strathclyde sought the Committee’s advice about accepting a part-time, paid appointment as adviser to JC Bamford Excavators (JCB).</p> <p>When considering his application, the Committee took into account that you 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 (or dealings with any of them) and he will not be required to lobby Government in his proposed role.</p> <p>The Committee advised Lord Strathclyde that it saw no reason why he should not take up the appointment subject to the conditions that:</p> <ul style="list-style-type: none"> ● 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 your his employer, its parent company or its clients. 	
Date of approval Approval letter	October 2013

Adviser - Ferrero UK	
Took up new appointment	March 2014
<p>Lord Strathclyde sought the Committee's advice about accepting a part-time, paid appointment as an adviser to Ferrero UK.</p> <p>The Committee took into account that he did not have any direct official dealings with your 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.</p> <p>The Committee advised Lord Strathclyde that it saw no reason why he should not take up the appointment subject to the conditions that:</p> <ul style="list-style-type: none"> ● that he should not draw on any privileged information available to him as a Minister; and ● for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients. 	
Date of Approval Approval letter	February 2014
Bill Wiggin MP Former Assistant Whip	
Left office	5 September 2012
<p>Non-executive director at Philip T English International Financial Services Ltd Non-executive director at Allpay Ltd Manager, Emergin Manager Incubation Services at Apex Fund Services Ltd</p>	
<p>Mr Wiggin sought retrospective permission to accept the following part-time, paid appointments, which he had already taken up:</p> <ul style="list-style-type: none"> - Non-executive director at Philip T English International Financial Services Ltd, which provides financial services to private and corporate clients, including portfolio management, international brokerage of pensions and life contracts, long-term care planning, tax planning strategies and international company and trust formation. - Non-executive director at Allpay Ltd, provides bill payment services and related functions such as prepaid cards and legal services, primarily to the public sector. - Manager, Emerging Manager Incubation Services at Apex Fund Services Ltd, a global independent fund administration company which offers services including fund set up, portfolio valuations, fund accounting, shareholder services, corporate secretarial administration, directorships and listing sponsorship. <p>When considering this application, the Committee took into account the fact that Mr Wiggin had had no official dealings with his prospective employers or any competitors in his ministerial capacity.</p> <p>The Committee advised him that it saw no reason why he should not have accepted these</p>	

appointments, subject to the condition that, for two years from his last day in office, he should not become personally involved in lobbying Government on behalf of his employers.

The Committee did however note with concern that advice was not sought when the appointments were first taken up.

Date of approval

[Approval letter](#)

November 2013

Annex E

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:
 - Permanent civil servants;
 - Civil servants on fixed term contracts;
 - Civil servants on secondment to other organisations;
 - Those on secondment to the Civil Service from other organisations⁴; and
 - 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 assessed 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 decision⁵.
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

⁴ 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.

⁵ 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 lobbying⁶ 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.

⁶ 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 lobbying⁷ 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.

⁷ 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 one⁸.

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

⁸ 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
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.

Tera Allas, former Director General for Strategic Advice at the Department for Business, Innovation and Skills	
Leaves Crown Service	January 2014
Independent Consultant; and Member of the Fiscal Policy Panel - States of Jersey	
States of Jersey Appointment Announced Took up new appointment	March 2014 April 2014
<p>Mrs Allas sought permission to accept a part-time, paid appointment as a Member of the Fiscal Policy Panel providing independent advice to the States of Jersey on its fiscal policy. Mrs Allas is also sought permission to set up a general consultancy company.</p> <p>The Prime Minister has accepted the Committee's recommendation that the Independent Consultancy application be approved subject to the following conditions:</p> <ul style="list-style-type: none"> - Mrs Allas should not draw on privileged information available to her as a Crown servant; - for two years from her last day in Crown service, she should not become personally involved in lobbying the UK Government Ministers or Crown servants, including Special Advisers, on behalf of any of his employers/clients; - once she has received approval to set up as an independent consultant, for two years from her last day of service she 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 she will be expected to submit a fresh application; and - for 12 months from her last day of service, Mrs Allas should not undertake any work with Frontier Economics which involves any BIS policy areas. <p>The Prime Minister has also accepted the Committee's recommendation that the States of Jersey application be approved subject to the conditions that:</p> <ul style="list-style-type: none"> - Mrs Allas should not draw on privileged information available to her as a Crown servant; - for two years from her last day in Crown service, she should not become personally involved in lobbying the UK Government Ministers or Crown servants, including Special Advisers, on behalf 	

of any of her employers/clients.	
Commission	
Science and Technology Policy Research Centre, University of Sussex	
Date of approval Approval letter	April 2014
Michael Anderson Prime Minister's Special Envoy on UN Development Goals and Director General for Policy and Global Issues (DFID)	
Leaves Crown service	August 2013
CEO, Children's Investment Fund Foundation	
Appointment announced Takes up new appointment	July 2013 September 2013
<p>Mr Anderson sought permission to accept a full time appointment as CEO of the Children's Investment Fund Foundation (CIFF), which aims to improve the lives of children living in poverty in developing countries.</p> <p>When considering this application the Committee took into account the fact that it is likely to include contact with Mr Anderson's former Department/Government as CIFF and DFID have common and shared objectives. It noted that CIFF and DFID are collaborating in an initiative but that Mr Anderson had recused himself from any decision-making or involvement in the organisation of this. It further considered the fact that CIFF does not receive funding from DFID and does not engage in lobbying Ministers or officials (beyond seeking agreement for arrangements on venues, common monitoring frameworks and other joint activities).</p> <p>The Committee noted that Mr Anderson had had official contact with CIFF but that he had not had contractual dealings with them, had not had access to any commercially sensitive information about competitors, and had not been involved in the development or administration of any policy or decisions that could have affected CIFF or its competitors. The Committee further noted the strong public interest grounds in only preventing Mr Anderson from lobbying the UK Government on matters not related to CIFF's core business.</p> <p>The Prime Minister accepted the Committee's recommendation that Mr Anderson's application be approved subject to the following conditions:</p> <p>- Mr Anderson should not draw on privileged information available to him from his time in Crown service; and</p> <p>- for two years from his last day in office, Mr Anderson should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients on any matters not related to CIFF's core business.</p>	
Date of approval Approval letter	June 2013
Air Marshall Sir Timothy Anderson Director General of the Military Aviation Authority (MOD)	

Leaves Crown service	April 2013
Independent Consultant	
Took up new appointment	May 2013
<p>Sir Timothy, the former Director General of the Military Aviation Authority (MAA), sought Committee's advice to set up as an independent consultant.</p> <p>His consultancy services will focus on the following: optimising, leading and managing organisational culture change; creating and assuring safe environments, products and service; strategy formulation; safety regulatory compliance; and executive board challenge and support.</p> <p>The Prime Minister has accepted the Committee's recommendation that this application be approved subject to the conditions that:</p> <ul style="list-style-type: none"> - for six months from his last day in Crown service he should submit a fresh application for any commission he wishes to accept with individuals, companies or organisations in policy areas within his remit as Director General in the Ministry of Defence; - that, for 2 years from his last day in Crown service, he should not become personally involved in lobbying the UK Government Ministers or Crown servants, including Special Advisers, on behalf of any of his employers/clients; - once he has received approval to set up as an independent consultant, he must seek confirmation from the Committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application. <p>Commissions</p> <p>PA Consulting Group - October 2013 Northrop Grumman International – December 2013 Kellogg Brown & Root Ltd- April 2014</p>	
Date of approval Approval letter	May 2013
<p>Sir Dominic Asquith Former HM Ambassador to Libya</p>	
Retired from Crown service	March 2013
Leading a trade delegation to Libya, Libyan British Business Council	
Took up new appointment	May 2013
<p>Sir Dominic sought permission to accept an unpaid appointment leading a trade delegation to Libya organised by the Libyan British Business Council (LBBC). LBBC promotes business relations and commercial activity between the British and Libyan business communities.</p>	

When considering this application, the Committee took into account the fact that Sir Dominic would have some contact with his former department, but also that he would not be required to lobby the Government and would not be representing any business company. The Committee further noted that Sir Dominic had not had contractual dealings with LBBC whilst in post, had not been responsible for any policy affecting them and had not had access to commercially sensitive information regarding any competitors.

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:

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

Date of approval Approval letter	April 2013
Consultant, Tatweer Research Centre	
Took up new appointment	June 2013
<p>Sir Dominic sought permission to take up a part time, paid appointment as senior consultant with Tatweer Research, a Libyan research and development company, specialising in technology and engineering.</p> <p>When considering this application the Committee noted that the appointment was likely to include contact with Sir Dominic's Department/Government and that Sir Dominic had had official contact with the Chief Executive of Tatweer Research, although not with the company itself. The Committee also noted that Sir Dominic had not had contractual dealings with his prospective employer, had not had access to commercially sensitive information about competitors, and had not been involved in the development or administration of policy that could affect Tatweer Research or its competitors.</p> <p>The Foreign Secretary accepted the Committee's recommendation that, the six month moratorium for Ambassadors having expired, the application should be approved subject to the conditions that:</p> <p>- Sir Dominic should not draw on privileged information available to him as a Crown servant; and</p> <p>- for two years from his last day of service, Sir Dominic should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.</p>	
Date of approval Approval letter	June 2013
Member of the Board of Advisers and Senior Fellow of the Institute of Statecraft	
Took up new appointment	July 2013

Sir Dominic sought permission to accept a part-time, unpaid appointment as a Member of the Board of Advisers and Senior Fellow of the Institute of Statecraft.

When considering this application, the Committee took into account that the appointment was unlikely to include contact or dealings with Sir Dominic's former department/Government. They noted that Sir Dominic had met the Director of the Institute during study visits, but that he had not had contractual dealings with the Institute, had not had access to commercially sensitive information about competitors, and had not been involved in the development of any policy related to the Institute or its competitors.

The Foreign Secretary accepted the Committee's advice that, the six month moratorium on Ambassadors having business dealings with the country of their last posting having already expired, the application be approved subject to the condition that:

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

Date of approval
[Approval letter](#)

May 2013

Independent Consultancy, Asquith Consultancy Ltd

Took up appointment

January 2014

Sir Dominic sought permission to set up an independent consultancy, Asquith Consulting Ltd, to provide political and commercial advice to businesses already operating in or seeking to enter the Middle East.

The Committee also considered commissions Sir Dominic wished to take up, none of which were with companies he had had official dealings with or would have been affected by policy he had been involved in, and they noted that Sir Dominic wished to take up two pieces of work under his consultancy that he had already been given permission for.

Taking into account that Sir Dominic left Crown service over six months earlier, and so any moratorium on dealings with his country of last posting would have already expired, the Foreign Secretary accepted the Committee's advice that the application be approved, subject to the conditions that:

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

- for two years from his last day in Crown service, Sir Dominic should not become personally involved in lobbying the UK Government, Ministers or Crown servants, including Special Advisers, on behalf of any of his employers/clients;

- for 12 months from his last day of service, Sir Dominic should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of any bid or contract relating directly to the work of the FCO (although this does not prohibit his work with the CPDS); and

- once Sir Dominic has received approval to set up as an independent consultant, for two years from his last day of service he must seek confirmation from the Committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application.

Commissions	
<p>GDFI Advisory Services (Strategic Adviser) GCP Sovereign Debt (Non Executive Director) CPDS (occasional co-director of courses) Tatweer Research (Adviser) Dentons LLP (US) (Senior Adviser)</p>	
Date of Approval Approval Letter	November 2013
Chairman of Libyan British Business Council (LBBC)	
Took up appointment	January 2014
<p>Sir Dominic sought advice from the Committee about accepting a part-time unpaid appointment as Chairman of the Libyan British Business Council.</p> <p>When considering the application, the Committee noted the appointments are likely to include contact/dealings with his former department/Government more generally as the companies are exploring ways in which UK businesses can secure commercial benefit from their activities in the Middle east.</p> <p>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:</p> <p>- Sir Dominic should not draw on privileged information available to him as a Crown servant; and</p> <p>- For two years from his last day of service, Sir Dominic should not become personally involved in lobbying</p>	
Date of Approval Approval Letter	August 2013
Nicholas Baird CMG CVO Former Chief Executive of UK Trade and Investment	
Left Crown Service	December 2013
Corporate Affairs Director, Centrica plc	
Appointment Announced	December 2013
<p>Mr Baird sought advice about accepting a full time, paid appointment as Corporate Affairs Director for Centrica plc. Centrica is a British multinational utility company headquartered in Windsor, United Kingdom (UK). Mr Baird will be responsible for Government Affairs, corporate reputation/responsibility sustainability issues and media/communications.</p> <p>When considering the application, the Committee 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</p>	

affected his prospective employer or its competitors.

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

- **For two years from his last day of service he should not become personally involved in lobbying UK Government on behalf of your new employers;**
- **He should not draw on privileged information available to him as a Crown servant; and**
- **A waiting period of three months from his last working day at UKTI and his starting date with Centrica plc.**

Date of approval

[Approval letter](#)

November 2013

Wendy Barnes

Former Chief Operating Officer, DECC

Left Crown service

December 2012

Non-Executive Director, Met Office

Took up new appointment

May 2013

Ms Barnes sought permission to accept a part-time, paid position as a Non-Executive Director for the Met Office. When considering this application, the Committee took into account the fact that the role may involve dealings with Ms Barnes's former Department. However, the Committee also noted that Ms Barnes had had no official dealings with the Met Office and had not been involved in decisions affecting them.

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, Ms Barnes should not become personally involved in lobbying Government on behalf of her new employers.**

Date of approval

[Approval letter](#)

April 2013

Non-Executive Director, BMT Group Ltd

Took up appointment

July 2013

Ms Barnes sought permission to accept a part-time, paid appointment as a Non-Executive Director of BMT Group Ltd (BMT). BMT is a leading engineering, science and technology consultancy, operating mainly in the maritime industries.

When considering this application the Committee took into the account the fact that the appointment was likely to include contact with Ms Barnes's former Government, as BMT works with the MOD in defence maritime. However, she had not had contractual dealings with BMT, nor had she had access to commercially sensitive information or been involved in policy related to BMT.

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

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

Date of approval Approval letter	May 2013
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Independent Consultant

Took up appointment	November 2013
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Ms Barnes sought permission to set up as an independent consultant delivering training in Information Assurance and Cyber Security and mentoring people e.g. Senior Information Risk Officers in this area.

When considering the application, the Committee noted that Ms Barnes had previously had responsibility for a contractual relationship with one of the organisations she listed as a possible client, but that this was a relationship shared by several departments across Government, and she had not been directly involved in its handling.

The Prime Minister accepted the Committee's recommendation that the application be approved on the following terms:

- for two years from his last day of service, Ms Barnes should not become personally involved in lobbying the UK Government on behalf of any of her clients;
- she should not draw on privileged information available to her from her time in Crown Service;
- for twelve months from her last day of service she should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the MoD or UK Armed Forces; and
- for two years from her last day of service, before accepting any new commission she should make a case directly to the Committee to confirm that each individual commission the applicant wishes to undertake would be permissible under the approved terms of the consultancy. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy she will be expected to submit a fresh application.

Commissions

November 2013 – National Archives, Cabinet Office

Date of approval Approval letter	November 2013
Non Executive Director, Templar Executives	
Took up appointment	October 2013
<p>Ms Barnes sought permission to accept an appointment as a non-executive adviser to Templar Executives.</p> <p>When considering this application, the Committee took into account the fact that the appointment was likely to include contact with Ms Barnes's former Department/Government as Templar Executives provides cyber security training and consultancy services to both the private sector and Government Departments. However, the Committee noted that Ms Barnes had not had any official or contractual dealings with Templar during her last two years of service; had not had access to any commercially sensitive information about competitors; and had not been involved in any policy or decisions that could affect Templar.</p> <p>The Prime Minister accepted the Committee's advice that the application be approved, subject to the conditions that:</p> <ul style="list-style-type: none"> - Ms Barnes should not draw on privileged information available to her from her time in Crown service; and - for two years from her last day of service, Ms Barnes should not become personally involved in lobbying the UK Government on behalf of her new employer or its clients. 	
Date of approval Approval letter	June 2013
<p>Professor Sir John Beddington Former Government Chief Scientific Adviser, Government Office for Science</p>	
Left Crown service	March 2013
Chairman of the Environment Advisory Board for Rolls Royce	
President to the Freshwater Biological Association (FBA)	
Appointment taken up	November 2013 (Rolls Royce)
Appointment taken up	November 2013 (FBA)
<p>Sir John sought advice from the Committee about accepting, a part-time unpaid appointment as Chairman of the Environment Advisory Board with Rolls-Royce and a part-time, unpaid appointment as President of the Freshwater Biological Society.</p> <p>When considering the applications, the Committee noted that Sir John had not had any contractual dealings and he has not been responsible for people who have had contractual dealings with his prospective employer during his last two years of service. Furthermore, he has not had access to commercially sensitive information about any competitors or been involved in the development or administration of any</p>	

departmental policy or decisions that could have affected his prospective employer or its competitors.

The Prime Minister accepted the Committee's recommendation that the applications 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 employers or its clients.

Date of Approval Approval Letter	November 2013
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Dame Nicola Brewer
Former Director of the Diplomatic Academy, Foreign and Commonwealth Office

Left Crown Service	February 2014
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Vice Provost International, University College London

Date of appointment announced Took up new appointment	March 2014 May 2014
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Dame Nicola Brewer, the former Director of the Diplomatic Academy at the FCO, sought advice about accepting an appointment as Vice Provost International at University College London.

The Committee noted that Dame Nicola will have responsibility for the development and strategic leadership of UCL's international strategy. The Committee took into account that Dame Nicola was offered the role following a competitive process.

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

-For two years from her last day of service Dame Nicola should not become personally involved in lobbying the UK Government on behalf of her new employers; and

-She should not draw on privileged information available to her as a Civil Servant.

Date of Approval Approval letter	March 2014
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Alan Charlton
Former HM Ambassador to Brasilia

Retired from Crown service	July 2013
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Special Adviser to the Vice-Chancellor, De Montfort University

Took up new appointment	October 2013
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Mr Charlton sought permission to accept a part time, paid position as a Special Adviser to the Vice Chancellor of De Montfort University.

When considering this application, the Committee took into account the fact that Mr Charlton had had official contact with De Montfort while in post, but also noted that he had similar contact with dozens of universities. The Committee noted that Mr Charlton had not had any contractual dealings with his prospective employers or their competitors, had not been involved in the development or administration of any policy relating to them, and had not had access to commercially sensitive information about any competitors. The Committee also took into account the fact that Mr Charlton had been made aware of the standard six month ban on Ambassadors giving advice on their country of last posting, and that he had confirmed this would not be a problem.

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

- for six months from Mr Charlton's last day in post he should not return to Brazil for business purposes, give advice on matters relating to Brazil, or have dealings with companies there; and**
- for two years from his last day of service, Mr Charlton should not become personally involved in lobbying the UK government on behalf of his new employer.**

Date of approval Approval letter	August 2013
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Independent Consultant

Took up new appointment	November 2013
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Mr Charlton sought permission to set up an independent consultancy, to help the UK public, private and third sectors in the fields of education, science and research in pro-bono and remunerated roles, especially with international affairs.

When considering this application, the Committee noted that Mr Charlton 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 and had instead been to promote existing policy and stronger partnerships with Brazil. The Committee also took into account the fact that Mr Charlton was aware of the standard six month ban on Ambassadors giving advice on their country of last posting.

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

- Mr Charlton should not draw on privileged information available to him as a Crown servant;**
- for two years from his last day in Crown service, he should not become personally involved in lobbying the UK Government Ministers or Crown servants, including Special Advisers, on behalf of any of his employers/clients;**
- for 12 months from his last day of service, Mr Charlton should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of any bid or contract relating directly to the work of the FCO;**

- for six months from his last day of service, Mr Charlton should not return to Brazil for business purposes, give advice on matters relating to Brazil or have dealings with companies there; and

- once he has received approval to set up as an independent consultant, for two years from his last day of service he must seek confirmation from the Committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application.

COMMISSIONS:

De Montfort University – Independent Governor

Nottingham University – Honorary Professor

Universities UK – Adviser

Institute of Latin American Studies – Robin Humphrey’s Fellow

Sherborne School – Governor

Date of approval Approval letter	October 2013
Lieutenant General Sir Gary Coward KBE CB Former Commander (Land), Defence Equipment and Support, Ministry of Defence	
Retired from the Army	October 2012
Military Adviser, Telereal Trillium	
Took up new appointment	June 2013
<p>Lt Gen Coward sought permission to accept a paid role as Military Adviser to Telereal Trillium, working 20 days per year. This role would involve advising the industry team in bidding and negotiating to become the Defence Infrastructure Organisation’s strategic business partner.</p> <p>The Committee took into account the fact that the MOD no relationship with Telereal Trillium and that the appointment was unlikely to include any contact with Lt Gen Coward’s former Department. They further considered the fact that Lt Gen had had no official or contractual dealings with Telereal Trillium and had not had access to any commercially sensitive information about any competitors.</p> <p>The Prime Minister accepted the Committee’s recommendation that the application should be approved subject to the condition that;</p> <p>- for two years from his last day of service, Lt Gen Coward should not become personally involved in lobbying the UK Government on behalf of his new employer, its partners or clients.</p>	
Date of approval Approval letter	May 2013
Chairman, Defence IQ	
Took up new appointment	August 2013

Lt Gen Coward sought the Committee's approval to accept a part-time, paid role of Conference Chairman to Defence IQ.

The Committee noted that the MOD has no relationship with Defence IQ. Sir Gary's appointment may include some contact/dealings with his former Department/Government. Albeit limited to coordinating with MOD ministers, officers and officials to participate in conferences. These contacts would be restricted to introductions and occasional questions in plenary, with very limited informal contact in the margins of formal sessions or at associated social events.

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

- for 12 months from his last day of service, he should not provide advice to his new employer, its partners or clients on any bid or contract directly related to the work of the Ministry of Defence; and
- for two years from his last day of service, Lieutenant General Coward should not become personally involved in lobbying the UK Government on behalf of his new employer, its partners or its clients.

Date of approval Approval letter	July 2013
Patrick Crawford Chief Executive, Export Credits Guarantee Department	
Resigned from Crown service	November 2012
Caxton Trust, Director and Trustee Board	
Took up new appointment	July 2014
Mr Crawford sought the Committee's permission to accept a part-time, unpaid appointment as member of the Director and Trustee Board of the Caxton Trust.	
The Committee noted that Mr Crawford did not have any contractual dealings and was not responsible for people who had contractual dealings with his prospective employer during his last two years of service.	
The Prime Minister has accepted the Committee's recommendation that this application be approved subject to the conditions that, for two years from his last day in Crown service, Mr Crawford should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.	
Date of approval Approval letter	May 2014
Michael Ellam Former Director General, HM Treasury	
Left Crown service	September 2013

Managing Director, HSBC	
Appointment announced Appointment to be taken up	September 2013 December 2013
<p>Mr Ellam sought permission to take up an appointment as a Managing Director at HSBC.</p> <p>When considering this application, the Committee noted that Mr Ellam's role at the Treasury had focused on international economic policy, rather than banking transactions. It further noted that the policy he had been involved with applied to the entire banking sector, rather than specifically to HSBC.</p> <p>The Committee considered the fact that Mr Ellam had had official contact with HSBC, but that this had been limited. They noted that he had not been involved in the provision of grants or contracts, or in applying regulations to specific companies. The Committee noted that Mr Ellam had been kept informed about the restructuring of RBS and Lloyds, but had had no active involvement in this.</p> <p>The Committee took into account that Mr Ellam had had no contractual dealings, and had not been responsible for people who had contractual dealings, with his prospective employer during his last two years of service.</p> <p>The Prime Minister accepted the Committee's recommendation that this application be approved, subject to the following conditions:</p> <ul style="list-style-type: none"> - a waiting period of 12 weeks from his last day in service; - Mr Ellam should not draw on privileged information available to him as a Crown servant, including commercially sensitive information about the restructuring of Lloyds and RBS; and - for two years from his last day of service, Mr Ellam 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 Approval letter	September 2013
Sir Jonathan Evans KCB Director General, Security Service	
Retired from Crown service	April 2013
Honorary Professor, St Andrews University	
Appointment taken up	August 2013
<p>Sir Jonathan sought advice on accepting an unpaid position as an Honorary Professor with St Andrews University.</p> <p>When considering this application, the Committee took into account that Sir Jonathan had not had any</p>	

contractual dealings with St Andrews University during his last two years of service and had not been responsible for people who had. They noted that Sir Jonathan had not had access to commercially sensitive information about any competitors of St Andrews and had not been involved in the development or administration of any policy or decisions that could affect them.

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

- a waiting period of three months from his last day of service (which is the usual waiting period observed by Permanent Secretaries and their equivalents); and the conditions that:

- Sir Jonathan should not draw on privileged information available to him from his time in Crown service; and

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

Date of approval
[Approval letter](#)

May 2013

Senior Associate, Accenture

Appointment taken up

October 2013

Sir Jonathan sought advice on accepting a paid position as a Senior Associate with Accenture, a global management consulting, technology services and outsourcing company.

When considering this application the Committee took into account the fact that Sir Jonathan had not had contractual dealings with his prospective employer during his last two years in service. They considered the fact that Sir Jonathan did have some official dealings with Accenture, when they carried out some advisory work and he attended some presentations they delivered, but that he had not been involved in the contract for this work. The Committee noted that Sir Jonathan had had some involvement with a competitor of Accenture, but that he did not have access to any commercially sensitive information and there would be no crossover between this and the work he would be doing at Accenture.

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

- a waiting period of three months from his last day of service (which is the usual waiting period observed by Permanent Secretaries and their equivalents); and the conditions that:

- Sir Jonathan should not draw on privileged information available to him from his time in Crown service; and

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

Date of approval
[Approval letter](#)

May 2013

Derek Feeley Director General for Health and Social Care, Scottish Government	
Leaves Crown Service	August 2013
Executive Vice President, Institute for Healthcare Improvement	
Appointment announced Appointment to be taken up	April 2013 September 2013
<p>Mr Feeley sought permission to accept a full time, paid role as the Executive Vice President of the Institute for Healthcare Improvement (IHI). Mr Feeley would be leading a range of strategic and international improvement programmes for IHI, which works to improve health, and to enable healthcare professionals to learn and collaborate with each other. When considering this application, the Committee noted that Mr Feeley had not had any direct contractual dealings with his prospective employer during his last two years of service. Furthermore, he has not been involved in the development or administration of any policy or decisions that could have affected IHI; nor has he had commercially sensitive information about any competitors.</p> <p>The Committee noted that the proposed role was likely to include contact with the Scottish Government and that there was an existing contract between NHS Scotland and IHI. However, Mr Feeley had played no part in the procurement of this contract, and it was due to end before he started the new role.</p> <p>The First Minister accepted the Committee's advice that the application be approved subject to the following conditions:</p> <p>-for two years from his last day in Crown service, Mr Feeley should not provide advice to his new employer on the terms of any bid or contract directly relating to the Scottish Government;</p> <p>-Mr Feeley should not draw on any privileged information available to him from his time in Crown service; and</p> <p>-for two years from his last day of service, Mr Feeley should not become personally involved in lobbying the Scottish Government or the UK Government (on non-devolved matters) on behalf of his new employer or its clients.</p>	
Date of Approval Approval letter	April 2013
Joanne Foster Special Adviser, Deputy Prime Minister's Office	
Left Crown service	October 2013
Senior PR Consultant, PHA Media	

Appointment taken up	October 2013
<p>Ms Foster sought permission to take up a fulltime position as a Senior PR Consultant for PHA Media, a public relations consultancy.</p> <p>When considering this application, the Committee took into account the fact that Ms Foster had not had contact with PHA Media as a Special Adviser, and that the appointment was unlikely to include any contact or dealings with her former Department or Government more generally. The Committee also noted that Ms Foster had not had access to any commercially sensitive information about any competitors of PHA Media, had not been involved in the development or administration of any policy that could affect them, and had not been involved in any regulatory work or the award of grants that could affect PHA Media or its competitors.</p> <p>The Permanent Secretary accepted the Committee’s recommendation that the application be approved subject to the conditions that:</p> <ul style="list-style-type: none"> - Ms Foster should not draw on privileged information available to her as a Special Adviser; and - for two years from her last day of service, Ms Foster should not become personally involved in lobbying UK Government on behalf of her new employer, its parent company, or its clients. 	
Date of approval Approval letter	September 2013
<p>Stephen Gethins Special Adviser, Scottish Government</p>	
Left Crown service	December 2012
Independent Consultancy	
Appointment taken up	June 2013
<p>Mr Gethins sought permission to set up as an independent consultant to give strategic advice on politics and public affairs to companies and not-for-profit organisations.</p> <p>When considering this application, the Committee took into account that Mr Gethins had not had any direct contractual dealings and had not been responsible for people who have had contractual dealings with any of his prospective employers during his last two years of service. The Committee noted that he had not had access to any commercially sensitive information about any of his prospective employers’ competitors, nor had he been involved in contracts or the award of grants that could have affected his prospective employers or any competitors. The Committee also took into account that Mr Gethins left Crown service over four months earlier and that any knowledge that he acquired whilst in service was unlikely to confer any particular advantage on his prospective employers.</p> <p>The Permanent Secretary accepted the Committee’s advice that the application be approved subject to the conditions that:</p>	

- Mr Gethins should not draw on privileged information available to him as a Special Adviser;
 - for two years from his last day of service Mr Gethins should not become personally involved in lobbying the Scottish Government or UK Government (on non-devolved matters) on behalf of his new employers, their parent companies or their clients;

- for six months from his last day of service Mr Gethins should submit a fresh application for any commission he wishes to accept with companies or organisations in policy areas within his remit in the Scottish Government; and

- for two years from his last day of service, Mr Gethins 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:

Greenhaus Communications
 RSPB
 2020 Renewables

Date of Approval Approval letter	May 2013
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Verity Harding
 Former Special Adviser to the Deputy Prime Minister

Leaves Crown Service	May 2013
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Public Policy Manager for Google UK Ltd

Took up new appointment	July 2013
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Ms Verity Harding sought permission to accept to accept a full-time, paid appointment as the Public Policy Manager for Google UK Ltd (Google). Google is an American multinational corporation specialising in internet-related services and products including search, cloud computing, software and online advertising technologies.

When considering the application, the Committee took into account the fact that, during her last two years of service, Ms Harding has not: had any official or contractual dealings with her prospective employer; or had access to any commercially sensitive information about any of her prospective employer's competitors.

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

- that she should not draw on privileged information available to her as a Special Adviser; and
- that for one year from her last day of service, Ms Harding 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.

Date of approval Approval letter	June 2013
Dave Hartnett CB Former Permanent Secretary for Tax, HM Revenue & Customs	
Retired from Crown service	July 2012
Adviser, International Monetary Fund (Russia)	
Took up appointment	September 2013
<p>Mr Hartnett sought permission to take up a short-term appointment as an adviser with the International Monetary Fund (IMF), to provide the Russian Government with a review of how successful changes to the tax administration over the past three years have been.</p> <p>When considering this application, the Committee noted that the appointment is unlikely to include contact/dealings with Mr Hartnett's former Department/Government. It took into account that Mr Hartnett had had some official dealings with the IMF but that these had been limited to presentations and did not include any contractual dealings. The Committee further noted that Mr Hartnett had not been involved in the development or administration of any policy that affected the IMF, nor had he had access to any commercially sensitive information about competitors.</p> <p>The Prime Minister accepted the Committee's recommendation that this application be approved subject to the conditions that:</p> <ul style="list-style-type: none"> - Mr Hartnett should not draw on any privileged information available to him whilst in Crown service; and - for two years from his last day of service, Mr Hartnett should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients. 	
Date of approval Approval letter	July 2013
Adviser, International Monetary Fund (Kenya)	
Took up appointment	November 2013
<p>Mr Hartnett sought permission to take up a short-term appointment as an adviser with the International Monetary Fund (IMF), to provide the Kenyan Government and tax administration with a review of how best to improve the performance of the tax administration while transferring the Customs Unit to a new East African customs organisation.</p> <p>When considering this application, the Committee noted that the appointment is unlikely to include contact/dealings with Mr Hartnett's former Department/Government. It took into account that Mr Hartnett had had some official dealings with the IMF but that these had been limited to presentations and did not</p>	

include any contractual dealings. The Committee further noted that Mr Hartnett had not been involved in the development or administration of any policy that affected the IMF, nor had he had access to any commercially sensitive information about competitors.

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

- Mr Hartnett should not draw on any privileged information available to him whilst in Crown service; and

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

Date of approval Approval letter	November 2013
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Adviser, International Monetary Fund (Greece)

Took up new appointment	February 2014
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Mr Hartnett sought the Committee's advice about accepting a short-term appointment as an adviser on an IMF mission to Greece, to take forward the design of parts of the new Greek tax administration.

The Committee noted that the appointment is unlikely to include contact/dealings with Mr Hartnett's former Department/Government. The Committee took into account that Mr Hartnett had had some official dealings with the IMF over a number of years; however, these were limited to presentations on tax administration and tax compliance. The Committee noted that he had not had contractual dealings with his prospective employer during his last two years of service, nor had he been responsible for people who had.

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

- Mr Hartnett should not draw on privileged information available to him whilst in Crown service; and

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

Date of approval Approval letter	February 2014
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Joel Kenrick

Former Special Adviser to the Secretary of State, Department for Energy and Climate Change

Resigned from Crown service	February 2012
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Junior Consultant with Boston Consulting Group

Took up new appointment	April 2013
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Joel Kenrick sought advice on seeking permission to accept a full-time, paid appointment that he has taken up as a junior consultant with the Boston Consulting Group (BCG). When considering the application the Committee took into account that the appointment is unlikely to include contact and/or dealings with his Department and/or Government more generally. However, BCG had previously had contracts with the wider UK public sector and it is feasible that Mr Kenrick could be staffed on one of these in the future. The Committee noted that, to Mr Kenrick's knowledge, BCG had never conducted any work for DECC.

The Committee saw no reason why Mr Kenrick should not accept this appointment forthwith subject to the conditions that:

- that he should not draw on privileged information available to him as a Special Adviser; and
- that, for two years from his last day of service, Mr Kenrick should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of his new employer or its clients.

Date of Approval	May 2013
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Sir Stephen Laws KCB QC
Former First Parliamentary Counsel

Retired from Crown service	January 2012
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Member of the Advisory Board, Bristol University

Took up new appointment	December 2013
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Sir Stephen sought permission to accept an appointment as a Member of the Advisory Board for the Law School at Bristol University.

When considering this application, the Committee took into account the fact that Sir Stephen had not had contractual dealings with the University of Bristol in his last two years in office, and had not been responsible for people who had. The Committee noted that the role was not likely to include contact with his former Department or Government and that he had not had access to any commercially sensitive information about any competitors of the University.

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

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

Date of approval Approval letter	October 2013
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Air Marshal Sir Kevin Leeson
Former Chief of Material (Air), Ministry of Defence

Retired from Crown Service	March 2013
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Senior Safety Advisor, British Airways	
Took up new appointment	December 2013
<p>Sir Kevin sought the Committee's advice on taking up a paid appointment, as Senior Safety Advisor with British Airways.</p> <p>The Committee noted that Sir Kevin's role with British Airways will not include any dealing with his previous employer. They also took into account that while in post did not have any official dealings with British Airways, and had not been involved in any decisions affecting them.</p> <p>The Secretary of State for Defence accepted the Committee's recommendation that the application be approved subject to the following condition:</p> <p>- for two years from his last day of service, Sir Kevin should not become personally involved in lobbying the UK Government on behalf of his new employer, its parent company or its clients.</p>	
Date of Approval Approval letter	December 2013
Jonathan Rees Former Director General, Government Equalities Office	
Resigned from Crown service	February 2013
Board Member and Trustee, Employers Network on Equality and Inclusion	
Took up new appointment	June 2013
<p>Mr Rees sought permission to accept an unpaid position, working two days per year, as a Board Member and Trustee of the Employers Network on Equality and Inclusion (ENEI), the UK's leading employer network covering all aspects of equality and inclusion issues in the workplace.</p> <p>When considering this application, the Committee took into account the fact that Mr Rees was likely to have contact with his former department/Government, as one of ENEI's published aims is to advise the Government on equality related policy issues, and a number of Government Departments are members of the network. However, the Committee also noted that no lobbying would be involved and that Mr Rees had not contractual dealings with ENEI, nor had he been involved in policy decisions that could affect ENEI or had access to commercially sensitive information related to any competitors.</p> <p>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the conditions that:</p> <p>- for twelve months from his last day in Crown service, Mr Rees should not provide advice to ENEI or any clients on the terms of any bid or contract directly relating to the GEO;</p> <p>- for twelve months from his last day of service, Mr Rees should not personally represent ENEI in any official capacity in their dealings with Government Departments;</p> <p>- Mr Rees should not draw on privileged information available to him from his time in Crown service; and</p>	

- for two years from his last day of service, Mr Rees should not become personally involved in lobbying the UK Government on behalf of ENEI or its clients.	
Date of approval Approval letter	May 2013
Independent Board Member, Ombudsman Services	
Took up new appointment	September 2013
<p>Mr Rees sought permission to take up an appointment as an Independent Board Member for Ombudsman Services.</p> <p>When considering this application, the Committee noted that Mr Rees had not had contractual dealings with the Ombudsman Services, had not had access to commercially sensitive information about any competitors, and had not been involved in the development or administration of any policy that could affect his prospective employer.</p> <p>The Prime Minister accepted the Committee's recommendation that this application be approved subject to the conditions that:</p> <ul style="list-style-type: none"> - Mr Rees should not draw on privileged information available to him as a Crown servant; - for 12 months from his last day of service, Mr Rees should not have direct involvement with work connected to the Home Office or DCMS; and - for two years from his last day of service, Mr Rees should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients. 	
Date of approval Approval letter	September 2013
Independent Director, Lending Standards Board	
Date of announcement	March 2014
<p>Jonathan Rees sought the Committee's advice on a part-time, appointment, as Non-Executive Director for the Lending Standards Board.</p> <p>The Committee took into account that Mr Rees's proposed role may include contact with some Government Departments and/or regulators with an interest in banking issues, but that no contact with the Home Office or DCMS/GEO was proposed, and that the position would not involve lobbying.</p> <p>The Prime Minister has accepted the Committee's recommendation that this application be approved subject to the conditions that:</p> <ul style="list-style-type: none"> - Mr Rees should not draw on privileged information available to him as a Crown servant; - for two years from his last day of service, Mr Rees should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients. 	
Date of approval Approval letter	March 2014

General Sir David Richards GCB CBE DSO ADC Gen

Former Chief of the Defence Staff

Retired from Crown service

July 2013

Senior Adviser to the International Institute of Strategic Studies (IISS)

General Richards sought advice about accepting a part-time appointment as Senior Adviser to the International Institute of Strategic Studies. The IISS is a British think tank in the area of global security, political risk and military conflict. His role will include chairing seminars at IISS's annual summits in Singapore and Bahrain (the Shangri-La and Manama Dialogues), as well as giving advice on strategic theory and practice more generally.

When considering the application, the Committee noted that the three-month waiting period to which Sir David is subject as a Permanent Secretary equivalent had expired and that he had previously had some come contact with the International Institute of Strategic Studies but no dealings of a contractual nature.

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.

Date of approval[Approval Letter](#)

October 2013

Sir Nigel Sheinwald GCMG

Former HM Ambassador in Washington

Retired from Diplomatic Service

March 2012

Senior Advisor, Brunswick Group

Took up appointment

May 2013

Sir Nigel sought permission to accept an appointment as a senior advisor to the Brunswick Group, working two days per week. Sir Nigel's role would involve advising international clients on government, international and regulatory issues.

When considering this application, the Committee noted that Sir Nigel was likely to have contact with his former Department/Government. However, it also considered the fact that Brunswick does not engage in direct lobbying of Government. The Committee took into account the fact that Sir Nigel had had no official dealings with his prospective employer or its competitors, or influence over decisions that would affect their business. The Committee further noted that Sir Nigel had left his post 15 months earlier and so was no longer subject to the six month moratorium usually observed by Ambassadors.

The Foreign Secretary accepted the Committee's recommendation that the appointment be approved on the condition that, for two years from his last day of service, Sir Nigel should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients.

Date of approval Approval letter	May 2013
Rohan Silva Former Senior Policy Adviser, Number 10 Policy Unit	
Left Crown service	June 2013
Entrepreneur in Residence, Index Ventures	
Took up new appointment	July 2013
<p>Mr Silva sought the Committee's advice about a full time appointment as Entrepreneur in Residence at Index Ventures, a venture capital investment firm.</p> <p>The Committee noted with concern that this application was received from the Cabinet Office after the role had been taken up. However, when considering the application retrospectively, the Committee took into account the fact that Mr Silva had not had any contractual dealings with his prospective employer and that the appointment was unlikely to include contact/dealings with his former Department/Government. The Committee noted that Mr Silva had had official dealings with Index Ventures, as they had been involved in roundtable discussions and other events at No 10. However, it also considered that he had not had access to commercially sensitive information about any competitors. It further considered that Mr Silva's role at Index Ventures would involve working full time on establishing his own business and that he would not be carrying out any work directly for the company.</p> <p>The Permanent Secretary accepted the Committee's recommendation that the application be approved retrospectively, subject to the conditions that:</p> <ul style="list-style-type: none"> - Mr Silva should not draw on any privileged information available to him whilst in Crown service; and - For two years from his last day of service, he should not become personally involved in lobbying the UK Government on behalf of his new employer or its clients. 	
Date of approval Approval letter	July 2013
Adam Smith Former Special Adviser to the Secretary of State for Culture, Media and Sport	
Left Crown service	April 2012
Head of External Affairs, Paddy Power	
Took up new appointment	September 2013

Mr Smith sought permission to take up a full time appointment as Head of External Affairs for Paddy Power.

When considering this application, the Committee noted that Mr Smith had been involved in issues related to gambling regulation while at DCMS, but that any influence he had over policy would have affected the entire sector rather than Paddy Power specifically. The Committee further noted that Mr Smith had not had access to commercially sensitive information about any competitors of Paddy Power. The Committee also took into account that both Ministers Mr Smith advised on such issues have since left their posts in DCMS, and that it has been 16 months since Mr Smith left his own position.

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

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

Date of approval
[Approval letter](#)

September 2013

Anthony Smith

Interim Director General for UK Border Force, Home Office

Left Crown Service

March 2013

Independent Consultant, Fortinus Ltd

Took up new appointment

June 2013

Mr Smith sought the Committee's about permission to set up as an independent consultant, Fortinus Ltd, which specialises in border security, leadership and programme sponsorship, and major events.

The Committee noted that his proposed work so unlikely to include contact/dealings with his former Department/Government and that he has no plans to lobby UK Ministers or officials.

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

- for six months from his last day of service he should submit a fresh application for any commission he wishes to accept with individuals, companies or organisations in policy areas within his remit in the UK Border Force;
- for two years from his last day of service, he must seek confirmation from the Committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application;
- he should not draw on privileged information available to him from his time in Crown service; and
- for two years from his last day of service, Mr Smith should not become personally involved in lobbying the UK Government on behalf of his new company or its employers/clients.

Commissions:

Steria Ltd

FCO Service Ltd Augmentiq (Switzerland) Ltd Accenture	
Date of approval Approval letter	May 2013
Admiral Sir Trevor Soar KCB OBE Former Commander in Chief Fleet, Royal Navy	
Retired from Crown service	March 2012
Independent consultant and commission with Babcock International Group	
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
Sam Talbot Rice Special Adviser, Department of Health	
Left Crown service	May 2013
Independent Consultant, Centre for Policy Studies	
Took up appointment	November 2013
<p>Mr Talbot Rice sought permission to undertake work as an independent consultant for the Centre for Policy Studies.</p> <p>When considering this application, the Committee took into account the fact that, during his last two years of service, Mr Talbot Rice had not: had official dealings with his prospective employer; had access to any commercially sensitive information about any of his prospective employer's competitors; been responsible for people who have had contractual dealings with his prospective employer; or had any direct role in the development or administration of any policy or decisions (including the award of grants) that could have affected his prospective employer or its competitors.</p> <p>The Committee took into account that Mr Talbot Rice did have access to long term policy thinking, but noted that it was over three months since he left Crown service and the majority of this thinking was now in the public domain.</p> <p>The Permanent Secretary accepted the Committee's recommendation that the application be approved, subject to the conditions that:</p> <ul style="list-style-type: none"> - Mr Talbot Rice should not draw on privileged information available to him as a Special Adviser; - for twelve months from his last day of service, he should not provide advice to CPS or their clients on any bid or contract relating to the work of the Department of Health; - he should ensure it is clear that he is not operating on behalf of the Department of Health, or have special access to the Department, when CPS is soliciting business from other organisations; and - for two years from his last day of service he should not become personally involved in lobbying the UK Government, Ministers or Crown servants, including Special Advisers, on behalf of his new employer or its clients. 	
Date of approval Approval letter	October 2013
Moira Wallace OBE	

Former Permanent Secretary, Department for Energy and Climate Change	
Left Crown service	October 2012
Visiting Professor, London School of Economics	
Took up new appointment	December 2013
<p>Ms Wallace sought permission to accept a part-time, unpaid appointment as Visiting Professor at the Centre for the Analysis of Social Exclusion at the London School of Economics.</p> <p>The Committee took into account that Ms Wallace has not had access to any commercially sensitive information about any competitors of her prospective employer. Furthermore, she has not been involved in the development or administration of any policy or decisions (including regulatory work or the award of grants) that could have affected her prospective employer or its competitors.</p> <p>The Prime Minister accepted the Committee's recommendation that, the three month waiting period observed by former Permanent Secretaries having expired, Ms Wallace's 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 the UK Government on behalf of her new employer or its clients.</p>	
Date of Approval Approval letter	April 2013
Mr Ian Watmore Former Permanent Secretary, Cabinet Office	
Resigned from Crown Service	June 2012
Non-Executive Director, Information Commissioner's Office	
Took up new appointment	September 2013
<p>Mr Watmore sought the Committee's advice on taking up a paid appointment with the Information Commissioner's Office.</p> <p>Mr Watmore's role will involve advising executive management on public and private sector. The Committee noted his appointment is likely to include occasional contact and/or dealings his former Department/Government as he will be advising executive management on public and private sector. The Committee also noted he had occasional meetings with the Information Commissioner in his former role as Permanent Secretary.</p> <p>The Prime Minister accepted the Committee's recommendation noting that, the three-month waiting period for Permanent Secretaries (and above) having expired, his application was approved subject to the following conditions:</p> <p>- that he should not draw on any privileged information available to him whilst in Crown</p>	

service; and	
- for two years from his last day of service, he should not become personally involved in lobbying Government on behalf of your new employer or its clients.	
Date of approval Approval Letter	September 2013
Sir Bob Watson CMG Former Chief Scientific Adviser, Department for Environment, Food and Rural Affairs	
End of fixed-term contract	September 2012
Consultant, United Nations Foundation	
Took up new appointment	October 2013
<p>Sir Bob sought advice on accepting a short-term position as a consultant for the United Nations Foundation.</p> <p>When considering this application, the Committee noted that Sir Bob had not had any direct or official dealings with the United Nations Foundation while in post. It also took into account that Sir Bob had not been involved in the development or administration of any decisions that could have affected his prospective employer or its competitors, and had not had access to commercially sensitive information about any competitors.</p> <p>The Prime Minister accepted the Committee's recommendation that the application be approved subject to the condition that:</p> <p>- 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.</p>	
Date of approval Approval letter	September 2013
Rob Whiteman Former Director General, Home Office	
Left Crown service	September 2013
Chief Executive, Chartered Institute of Public Finance and Accountancy (CIPFA)	
Took up new appointment	September 2013
Mr Whiteman sought advice on a full time, paid appointment as Chief Executive of CIPFA.	

The Committee noted with great concern that the Home Office had announced this appointment nearly one month before approval was sought.

However, when considering this application, the Committee took into account that Mr Whiteman's Department had had no relationship with CIPFA and that he has not had access to any information about related policy or commercially sensitive information about competitors. The Committee took into account that the post would involve dealings with Government in general, but that these would not include areas Mr Whiteman worked on in the Home Office. The Committee also took into consideration the views of Mr Whiteman's Department that there was no perceived conflict in this role, but that some conditions should be attached due to the potential contact with Whitehall.

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

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

- for two years from his last day of service, Mr Whiteman should not be directly involved in work connected to his previous responsibilities at the Home Office; and

- for two years from his last day of service, Mr Whiteman should not become personally involved in lobbying UK Government on behalf of his new employer or its clients. He should not use his Whitehall contacts to influence policy or secure business for any clients.

Date of approval Approval letter	September 2013
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