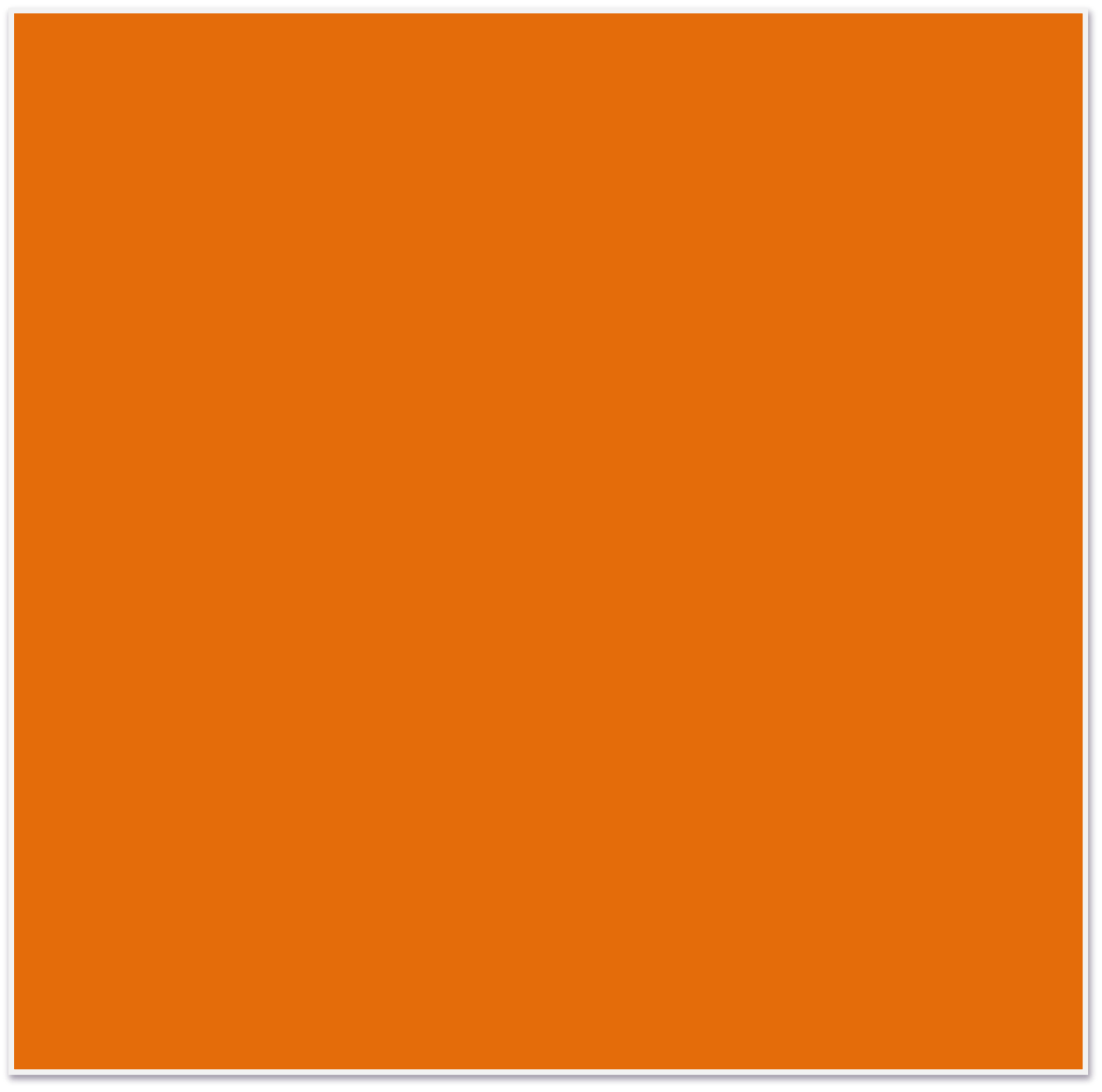




Advisory Committee on Business Appointments

Seventeenth Annual Report 2015-2016



19 July 2016

Dear Prime Minister,

SEVENTEENTH ANNUAL REPORT

This letter accompanies the seventeenth report of the Advisory Committee on Business Appointments, which covers the year to 31 March 2016.

As anticipated in last year's report, the number of applications dealt with by the Committee in 2015-16 was significantly higher than in the previous year as a result of the May 2015 General Election. The Committee dealt with 123 applications from former Ministers in 2015-16 compared to 49 in 2014-15. Applications from former Crown servants also rose from 89 to 110, although this was a result of more applications from fewer individuals rather than an increase in the number of applicants.

Despite this increase in casework, which amounted to a 70% increase over 2014-15 in the Committee's workload, I am pleased to report that 75% of applications were dealt with within deadlines, compared to 62% the year before. This was due to the hard work of the Committee and its secretariat, and has been achieved without compromising the amount of care and attention we give to each case. (Following the Election we factored the expected increase in applications into the secretariat's staffing arrangements in the first half of the year.)

During the year, I continued to visit Departments to raise awareness of the rules and discuss Department-specific issues with Permanent Secretaries, and this programme of visits is ongoing.

As I said at my pre-appointment scrutiny hearing before the (then) Public Administration Select Committee and my more recent appearance before its successor, we will not hesitate to pass on our observations to Government where appropriate on how the rules could be implemented more effectively, based on our experience of dealing with cases.

This is why I wrote to the Minister for the Cabinet Office in November recommending that the definition of lobbying contained in the rules is amended to capture the spirit of the rules and the principles they are designed to uphold more comprehensively, and that in future the full text of the rules is annexed to the Ministerial Code. It is disappointing that I have yet to receive a response to my letter.

At the same time, where the Committee identifies trends emerging during the course of its work we will respond to them as we deal with the related casework. The most significant trend we saw during the reporting period was the apparently increasing tendency for individuals to seek to take up appointments in business or other sectors with which they have had dealings while in public office.

We are always conscious of the rights of individuals who seek to change employment. Indeed, the Committee is mindful of the strong public interest in those with experience in public administration being able to move into posts within the private sector and elsewhere, and the benefits this brings to individuals, employing organisations and wider society. Former Ministers or officials may also, quite understandably, seek to return to their previous employers or industries.

Equally, the Committee seeks to ensure there is no cause for *justified* public concern, criticism or misinterpretation surrounding movement between the public and private sectors. We will, of course, continue to consider each application on its merits, but the Committee is clear that significant involvement with a sector while in office will increase the likelihood of us recommending a waiting period between an individual's last day of service and the date an outside appointment can be taken up. Year on year comparisons must be treated with some caution, however I believe it is instructive that the Committee recommended waiting periods for 14 appointments in 2015-16 (two of which have yet to be announced) compared to seven in 2014-15 and six in 2013-14.

Although the Committee does not have a formal role in monitoring compliance with the rules I am happy to report that, as in previous years, we have come across very few examples of non-compliance. When we do receive an application retrospectively, we make public our concerns by publishing our letter to the individual concerned or his or her former Department. Likewise, the Committee expresses its concerns publically when it comes to our attention that individuals have failed to submit applications before accepting appointments.

Finally, it is worth noting that 2015-16 was the first full year in which all the independent members of the Committee and myself, as Chair, were appointed in accordance with the Commissioner for Public Appointments' Code of Practice. This development can only serve to increase public confidence in the business appointments system and enhance the effectiveness of the Committee itself. Our membership now reflects a broad range of experience and expertise, including from across the Civil Service, the UK Parliament and devolved administrations, and the not for profit and private sectors.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Angela Browning', with a long, sweeping underline.

The Baroness Browning

Advisory Committee on Business Appointments
Seventeenth Annual Report
2015-2016

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Part 1 - The Committee

The Committee's role

1. The Advisory Committee on Business Appointments (the Committee) was established by the Prime Minister in 1975. It is an independent, advisory, non-departmental public body, whose sponsoring Department is the Cabinet Office.
2. The Committee advises on the application of the Government's Business Appointments Rules on outside appointments¹ (the Rules), which apply to both Crown servants and Ministers after they leave office.
3. The Committee provides independent advice² on the application of the Rules in relation to the most senior Crown servants (civil servants at Director General-level and above, and their equivalents); and to all former Ministers of the UK, Scottish and Welsh Governments.³
4. During the reporting period the Committee advised on 110 appointments of former Crown servants and on 123 appointments of former Ministers.
5. Further information about how the Committee approaches its work are set out in Parts 2 to 5 of this report.

Membership

6. The Committee has eight members, appointed by the Prime Minister. All members are appointed for a single non-renewable term of five years. Three members are political appointees; nominated by the Conservative, Labour and Liberal Democrat parties; and a further five are independent members, appointed following fair and open competition, in accordance with the Commissioner for Public Appointments' Code of Practice. The appointment of Baroness Browning as Chair of the Committee was also conducted in line with the Commissioner's Code, following her earlier nomination by the Conservative Party as that party's member.

¹ Equivalent versions of the Rules are in place for the Diplomatic Service, armed forces and intelligence agencies.

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

³ Advice is provided direct to former Ministers.

7. The membership of the Committee, which has remained the same throughout the reporting period, is:

- Mark Addison, independent member
- Sir Alex Allan, independent member
- Baroness (Angela) Browning, Conservative member and Chair
- Lord (Michael) German, Liberal Democrat member
- Mary Jo Jacobi, independent member
- Terence Jagger, independent member
- Baroness (Helen) Liddell of Coatdyke, Labour member
- John Wood, independent member

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

Expenditure

9. The Committee's expenditure figures are published annually in the Civil Service Commission's audited Accounts, reflecting the fact that the Civil Service Commission provides secretariat support for the Committee.⁴ The figures in the audited accounts include the cost of accommodation and other service charges paid to the Cabinet Office, the Committee's share of which was approximately £84,000 in 2015-16.

10. Excluding the service charges mentioned above, the Committee's total expenditure for 2015-16 was £218,000. This compares with £164,000 in 2014-15.

11. The increase can largely be attributed to the secretariat taking on additional staff for a six-month period in order to process the anticipated rise in applications from former Ministers and special advisers following the 2015 General Election (see Parts 4 and 5 for more detail about the increase in application numbers). Staff costs remained the largest element of the Committee's expenditure at £177,000 in 2015-16 (compared with £124,000 in 2014-15).

12. The Committee members' honoraria of £8,000 per annum for the Chair and £3,000 for each of the other members remained unchanged from last year and totalled £29,000.

13. Other costs included the cost of legal advice and the press officer contract.

⁴ <http://civilservicecommission.independent.gov.uk/publications/annual-reports/>

Governance

14. The Committee has a [Code of Practice](#), which is published on gov.uk⁵.
15. In March this year the Cabinet Office announced its new strategy for reviewing public bodies to ensure that they are efficient, effective and accountable⁶. A review of each body will be undertaken at least once in the lifetime of a Parliament. The Committee stands ready to cooperate with and contribute to its own review in due course.

Parliamentary scrutiny

16. On 16 April 2016 Baroness Browning appeared before the Public Administration and Constitutional Affairs Committee (PACAC) to give evidence on the work of the Committee during the last year.
17. The full [transcript](#) of her evidence can be found on the PACAC pages on the UK Parliament's website⁷.

⁵ <https://www.gov.uk/government/publications/acoba-code-of-practice-for-committee-members>

⁶ <https://www.gov.uk/government/publications/tailored-reviews-of-public-bodies-guidance>

⁷ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/public-administration-and-constitutional-affairs-committee/inquiries/parliament-2015/advisory-committee-on-business-appointments-15-16/>

Part 2 – The Rules

Purpose

18. The Business Appointments Rules are set by the Government. It has been the view of successive Governments that it is in the public interest for people with experience of public administration to be able to move into business or other bodies outside central government, and to be able to start a new career or resume a former one. However, it is important that when a former public servant takes up an appointment there should be no cause for public concern about the propriety of that appointment.
19. The aim of the Rules is to avoid any reasonable concerns that:
- a. an individual 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 Crown service, an individual 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.

Scope

20. The [Rules for civil servants](#) – which apply equally to civil servants serving the UK Government, the Scottish Government and the Welsh Government – can be found on the Committee’s pages on gov.uk and on Departmental intranets. They are designed to uphold the core values in the Civil Service Code, of integrity, honesty, objectivity and impartiality⁸.
21. Equivalent versions of the Rules are in place for Ministers, 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).

⁸ As temporary, political appointees, special advisers are exempt from the requirements to behave with objectivity and impartiality, but are bound by the values of integrity and honesty.

Part 3 – The Committee’s Approach

The decision-making process

22. The Committee’s remit is to provide advice. In formulating this advice it is required to strike a balance between the right of people to earn a living after leaving government and any justified public concern, criticism or misinterpretation surrounding the circumstances of an outside appointment. While mindful of the need to take a consistent approach when dealing with applications, the Committee considers each one on its merits in light of the facts of each case. This ensures that its advice is fair, reasonable and proportionate to the legitimate interests that the Committee has been set up to protect.
23. It is sometimes necessary to seek additional information from applicants, or their former Departments, to assist the Committee in forming its advice. Occasionally the Committee will meet an applicant, where an applicant or the Committee need to discuss its provisional advice further.
24. The Rules allow, in exceptional circumstances, for the Committee to advise that an appointment is unsuitable. However, past experience has shown that, in those rare cases when the Committee indicates informally to an applicant that it is likely to consider a particular appointment to be unsuitable or to recommend a substantial waiting period, it is often the case that the application is withdrawn or amended to such an extent that the Committee’s provisional advice can be revised. As only appointments that are taken up are published, the Committee’s website and reports do not show any unsuitable appointments. Nor do they show how the nature of initially potentially unsuitable appointments may have subsequently been modified at the Committee’s prompting.

The lobbying ban

25. As a general principle, former Ministers and Crown servants are required to observe a two-year ban on lobbying the particular administration within the UK that the applicant served while in Government. However, the Committee retains the flexibility to extend the lobbying ban to cover other administrations if the circumstances of an applicant warrant this. The two-year lobbying ban may also be waived or shortened by the Committee if it considers this to be justified by the particular circumstances of an individual application and if questions of propriety and public concern arising from the appointment or employment have been adequately addressed.

26. The Rules permit the Committee to qualify the lobbying condition to make clear that this restriction need not prevent individuals communicating with Government on matters that are an integral part of the normal course of business for their new employers. The Committee will only sparingly waive, shorten or qualify the lobbying ban as it considers it to be an important condition in guarding against the risk, either real or perceived, that a former Crown servant or Minister might influence a Government decision or policy to serve their own interests.

Moving to a job in the same sector

27. During the period of this report, the Committee has taken steps to increase the information available to it to ensure that it can best tailor the restrictions it recommends to each case.

28. The Committee has revised the business appointments application form to seek information explicitly about any dealings a former Minister or Crown servant may have had, while in office, with a particular commercial sector more broadly – not just the company or organisation to which they are seeking to move.

29. The Committee has also expanded its [Guidance for former Ministers](#)⁹ to make clear that significant involvement with a sector will increase the likelihood of the Committee recommending an additional waiting period.

Taking into account a current public role

30. Former Ministers may continue to represent Government in some capacity, for example, as a Trade Envoy or special representative. Such roles may involve privileged access to information and could create potential conflicts of interest between their current role representing Government and their proposed outside employment. (The Committee notes that there is no formalised code of conduct relating to this type of role, akin to the Ministerial Code(s), and believes it would be helpful if Government produced one.)

31. During this reporting period the Committee expanded its [Guidance for former Ministers](#) to give further information about the Committee's approach to dealing with applications of this type. The Committee will consider whether to extend the restrictions it would normally impose to take account of any continuing government role, for example by extending any condition around drawing on privileged information to information deriving

⁹ The Cabinet Office is responsible for guidance for civil servants.

from that role. It is also likely to recommend that the individual makes clear in any activities he or she undertakes on behalf of new employers that he or she is acting as the employers' representative and not on behalf of, or representing, Government. It may recommend an additional waiting period where there is a relationship between the post-Ministerial role and the outside appointment.

Retrospective applications

32. The Government amended the Rules in 2014 to make clear that retrospective applications will not normally be accepted. The Committee needs to be free to offer the most appropriate advice in any situation without it appearing to be constrained by an appointment already having been announced, or an individual already having signed a contract or taken up a post.
33. The Committee will make its concerns public when applications are received retrospectively by publishing the letter it writes to the individual (in the case of former Ministers) or the Department (in the case of former Crown servants) concerned. The Committee takes this approach in the expectation that drawing attention to a failure to submit an application will encourage others to follow the correct process. It also means that any improper appointment does not pass without comment. The Committee has also decided to express its concerns publically where it comes to the Committee's attention that individuals have failed to submit applications before accepting jobs.
34. There were five such cases during the reporting period, included in Annexes C and D.

'Gardening leave'

35. The Committee notes that the Rules allow for a Department to continue to pay former civil servants or special advisers who are required to observe a waiting period before taking up an outside appointment. However, the Committee has agreed that whether or not such a payment has been, or is likely to be, approved will not form part of the Committee's consideration when offering its advice.

Transparency

36. The Committee publishes its advice on all appointments it has considered that are subsequently taken up or announced¹⁰. It makes public as much detail as it is able to, after taking into account its responsibilities under data protection and freedom of information legislation.
37. It is through this transparency, as recommended by the Committee on Standards in Public Life, that all those involved in the business appointments process (including applicants, government Departments, outside employers and the Committee itself) are accountable to the public. Equally, if approached about an individual who has not submitted an application to the Committee when he or she should have done under the Rules, the Committee will also make clear that no application has been received.
38. The Committee's advice and the other material it publishes about how it operates are available on its website¹¹. As transparency is crucial to the Committee's work, the Committee keeps the effectiveness of its website under review. For the period 2015-16 the website had just over 40,000 'hits'.
39. The Committee welcomes the Government's commitment, in the 2014 iteration of the Rules, to greater transparency in relation to the outside appointments of more junior Crown servants, which are considered internally by Departments and do not come before the Committee for consideration. Details of these applications are now published on the relevant Departmental pages of gov.uk.
40. Since March 2010 the minutes of all Committee meetings have been published. In 2015-16 the Committee met four times to discuss a range of issues. The Committee will continue to publish minutes of future meetings once it has approved them.
41. As a public authority, the Committee is required to respond to requests for information in accordance with the Freedom of Information Act 2000 (FOIA). During the reporting period 9 requests were received and responded to.

¹⁰ With the exception of the appointments of a small number of individuals from the intelligence agencies, where information may be withheld for security reasons.

¹¹ <https://www.gov.uk/government/organisations/advisory-committee-on-business-appointments>

42. In February 2016 the Committee's approach to dealing with FOIA requests was supported by the Information Commissioner's Office's (ICO) ruling in favour of the Committee following a complaint about the Committee's handling of a FOIA request. The ICO's [decision notice](#) is available on its website. The complainant is currently appealing the ICO's decision to the Tribunal; we will report on the outcome in our next annual report.
43. The Committee maintains a register of its members' interests which is available on its website. Committee members follow a strict policy of declaring any individual interests related to a case and, if necessary, recusing themselves. The Committee publishes such details alongside its advice on the relevant case.

Part 4 - Ministers

The Ministerial Codes

44. The Ministerial Codes for the UK Government, Scottish Government and Welsh Government all require former Ministers to seek the Committee's advice before taking up appointments in the two-year period after they leave Ministerial office.
45. All three Codes are based on the premise which also underpins the Business Appointment Rules, that it is in the public interest for former Ministers with experience in Government to be able to move into business or into other areas of public life, and be able to start a new career or resume a former one. It is, however, equally important that when a former Minister takes up a particular appointment or employment, there should be no cause for any suspicion of impropriety.

Applications

46. In the reporting period, the Committee advised 33 former Ministers in relation to 123 appointments, including 18 commissions under the terms of independent consultancies agreed by the Committee.
47. Both the number of Ministers seeking advice and the number of applications rose significantly since the last reporting period (for 2014-15 they were 19 and 49 respectively). This can largely be attributed to the changes in Government and Parliament following the 2015 UK General Election.
48. Of the 123 appointments, 26 had not been taken up as of 31 May 2016. This may have been for a variety of reasons, including: the applicant had decided not to take up the appointment; the applicant had applied speculatively and the role never materialised or the role had not yet been taken up (possibly because the applicant was subject to a waiting period). The Committee's advice in relation to appointments that have been taken up or announced is published on its website. If and when others are taken up, the Committee's advice will be published.

The process

49. Former Ministers are asked to complete an application form, which is available on the Committee's website. We ask applicants to provide us with as full a picture of the proposed appointment as possible so that we

can provide fully informed advice. We will seek a view on the application from the Minister's former Department(s). We may also seek further confidential evidence from other sources, for example the Minister's proposed employer or their competitors. All applications are treated in strict confidence and remain confidential until appointments are taken up or publicly announced.

50. The Committee provides its advice direct to the former Minister. It aims to provide its advice within 15 working days of receipt of an application. However, the complexity of some cases, and the need to seek information and guidance from the Minister's former Department(s), means it is not possible for all cases to be fully considered within this timeframe. During the reporting period, the Committee provided its advice to former Ministers within 15 working days in 64% of cases (84% received advice within 20 working days). This compares with 51% in 2014-15, and 72% in 2013-14, and was despite the Committee receiving significantly more applications than in each of the previous two years (123 appointments in 2015-16, compared to 49 in 2014-15 and 58 in 2013-14).
51. The advice to former Ministers will typically include a ban on making use of privileged information available to them while in post and a two-year lobbying ban. Other conditions may be added, tailored to address the risks around individual appointments. Former Cabinet members of the UK Government are routinely subject to 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. The Committee can recommend a waiting period of up to two years. In exceptional circumstances, the Committee can recommend that a particular appointment is unsuitable (although the caveat set out in Part 3, explaining why the Committee's website and reports do not show any unsuitable appointments, should be noted here).
52. The Committee's advice is normally published as soon as the former Minister has advised the Committee that he or she has taken up or announced an appointment. We do not publish our advice where an appointment is subsequently not taken up.
53. 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.

54. All former Ministers are written to when they leave office to remind them of the need to ask the Committee for advice on all applications for two years after leaving office.
55. Graphs showing the number of requests for advice year-on-year and the numbers of requests by Department for this reporting period are at Annex B.
56. Details of the Committee's advice on the outside appointments of former Ministers in 2015-16 are at Annex C.

Part 5 – Crown Servants

Applications

57. The Rules apply to all Crown servants¹², including special advisers. The Committee is responsible for providing independent advice on their applications in relation to the most senior Crown servants who wish to take up appointments within two years of leaving Crown service.
58. The Rules specify that applications from special advisers “of equivalent standing” to civil servants at Director General (Senior Civil Service pay band 3) level and above need to be considered by the Committee. As civil service and special adviser pay bands do not mirror each other exactly, Departments may need to exercise judgement, in consultation with the Cabinet Office and Committee secretariat where necessary, as to whether special advisers’ applications should be referred to the Committee.
59. Departments deal with more junior applications under their own arrangements, and publish details of the appointments as part of their own transparency data. Permanent Secretaries are responsible for the operation of the Rules in their Departments.
60. In the reporting period, the Committee advised 36 Crown servants in relation to 110 appointments. This compares with 41 Crown servants and 89 appointments in 2014-15, and 57 and 158 respectively in 2013-14.

The process

61. The Committee aims to provide its advice within 20 working days of receiving a fully completed application form. As each case is considered on its merits and some are complex, it is not possible to achieve this target in all cases. During this reporting period, 86% of cases were dealt with within the 20-day target. This compares with 67% in 2014-15 and 79% in 2013-14. As with Ministerial applications, our turnaround times have improved since the last reporting period despite an increase in the volume of applications.
62. Of the 110 appointments, 27 had not been taken up as of 31 May 2016. Possible reasons for this are explained at paragraph 48 above.

¹² In this context, the Civil Service, Diplomatic Service, armed forces and intelligence agencies.

63. Applicants must complete a standard application form which is available on the Committee's website. The form requests details of their current and previous posts as well as information on the proposed appointment, including whether or not it was advertised and if it will involve dealings with their former Department or government more generally. Applicants must also state if they have had any contractual or official dealings with their prospective employer, competitors of their prospective employer or the sector in which the employer operates over the previous two years; and if they have been involved in policy development or the award of grants that could affect either the prospective employer or its competitors.
64. Applicants must submit the application to both their countersigning officer and the Department's HR division for them to provide their assessments. The Department then sends the completed application to the Committee's secretariat. The Committee relies on the information provided by the Department and countersigning officer to inform its consideration of the application. The Committee considers each case individually against the Rules. It collects wider evidence where necessary, for example it might seek the views of other Departments, including the Cabinet Office, as "owner" of the Rules. In some instances the Committee will meet applicants to discuss the proposed appointment further.
65. The Committee will then reach a view on whether there should be any restrictions on the applicant taking up the proposed appointment. As a general principle, former Crown servants at Director General level and above, and their equivalents, will have to observe a two-year lobbying ban.
66. Former Crown servants at the equivalent of Permanent Secretary-level or above will be required to observe a minimum three-month waiting period after their last day of paid service, although this can be waived or reduced by the Committee if justified by the circumstances of the case. As with Ministers, the Committee can recommend a waiting period of up to two years.
67. Once the Committee has agreed its advice it writes to the relevant final decision-maker (whether Minister or Permanent Secretary), who then considers the application and the Committee's recommendation. Once he or she has made the decision the Committee is informed, as are the Department and applicant.
68. The applicant is responsible for informing the Committee when he or she has taken up the appointment, or it has been announced. The Department is responsible for informing prospective employers of any conditions that have been attached to the approval of the appointment. Once the

Committee has been informed it will publish the details of the appointment and its advice on its website.

69. 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.
70. Graphs showing the number of requests for advice year-on-year and the numbers of requests by Department for this reporting period are at Annex B.
71. Details of the Committee's advice on the outside appointments of former Crown servants in 2015-16 are at Annex D.

Annex A - Biographies of Committee Members

Mark Addison joined the Department of Employment in 1978 and subsequently worked in a number of central Government Departments in 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). He was a Non-Executive Director of Salix Finance Ltd (2006-11), a Board member at the National Archives (2007-2012) and a member of Council at the Consumers' Association (2010-2016). He was Chair of the Nursing and Midwifery Council from 2012 until the end of 2014. He is currently a Public Appointments Assessor for the Commissioner for Public Appointments, a Trustee of the Charity for Civil Servants and Chair of the Dorset County Hospital NHS Foundation Trust.

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

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

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

to join the House of Lords. He is currently a member of the House of Lords EU Single Market Sub Committee, and in December 2015 was elected as Treasurer of the Liberal Democrats.

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

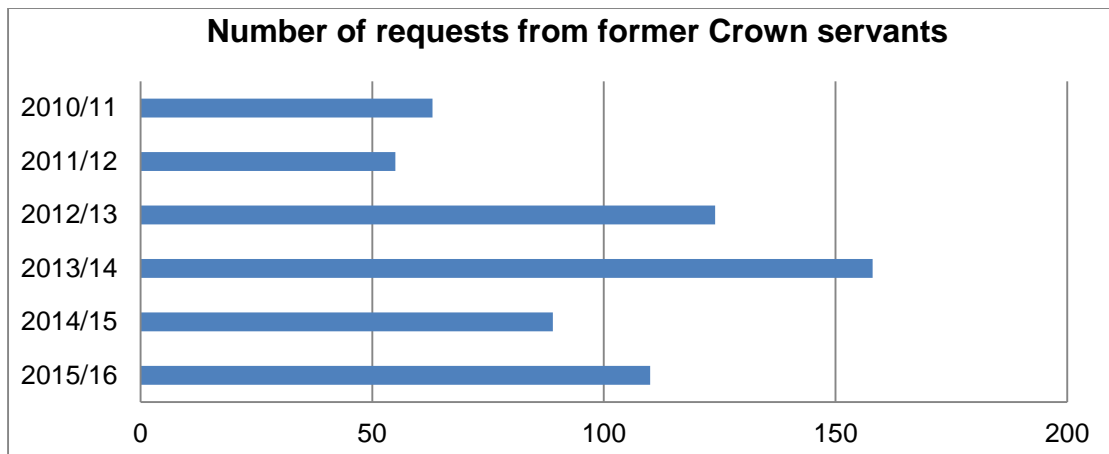
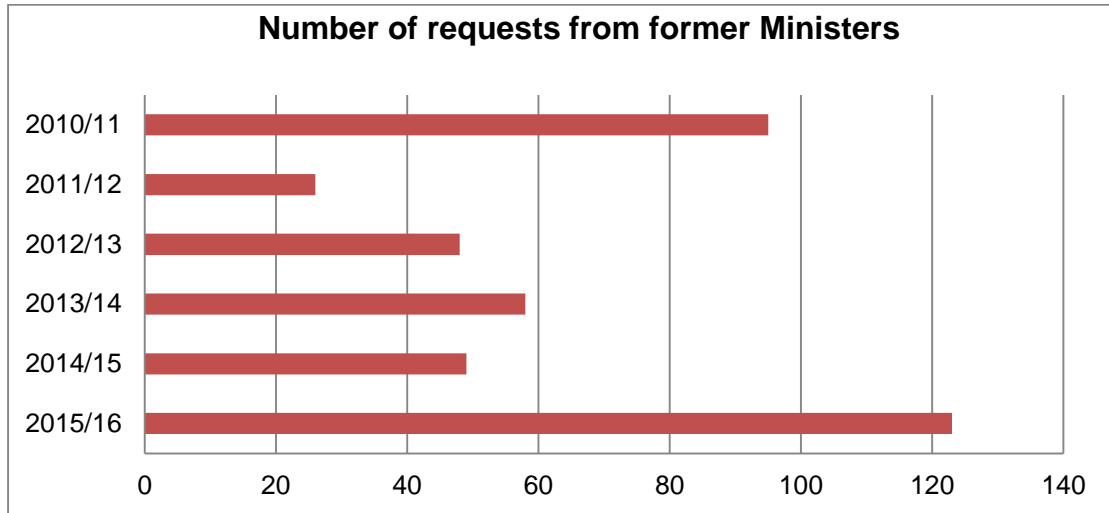
Terence Jagger's early career was in investor relations and strategy development with Shell, American Express, Burmah Oil and Unigate. After a Masters degree in Finance, he joined the civil service in 1995, where he worked in the Ministry of Defence until 2011. His roles included managing the PFI programme,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

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

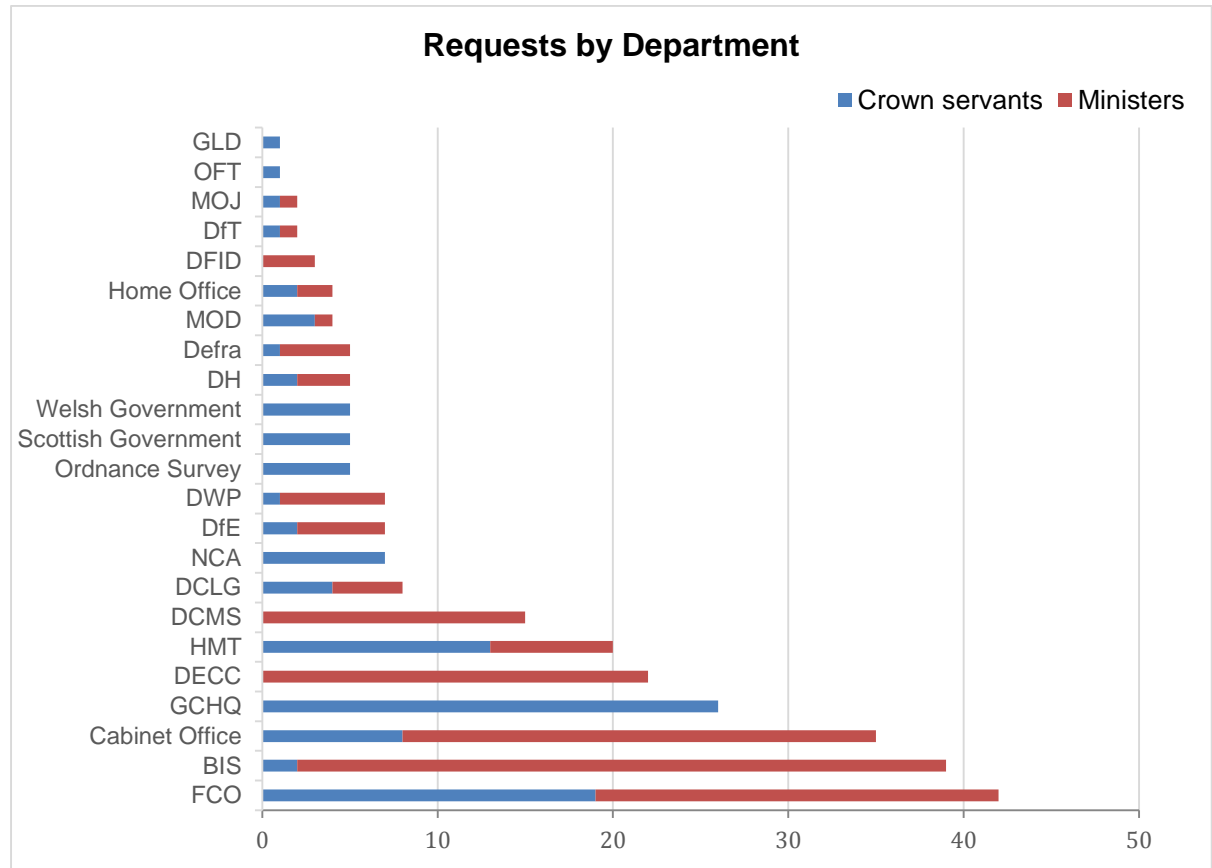
John Wood joined Herbert Smith, now Herbert Smith Freehills LLP, the city and international law firm, in 1972 and was a partner from 1982 to 2007. From 2008 to 2014 he was a legal board member of the Charity Commission and its interim chair in 2012.

Annex B – Appointments taken up

Number of Requests for Advice since 2010



Requests for Advice by Department* – 2015/16



* Individuals whose former Ministerial/ Crown servant role straddled more than one Department have been counted against each Department.

Annex C – The Committee’s advice to former Ministers

The Committee publishes its advice on all appointments it has considered, on an on-going basis, as and when they are either taken up or announced.

This annex contains summaries of that advice provided by the Committee during the reporting period.

Rt Hon Sir Danny Alexander

Sir Danny Alexander left his role as Chief Secretary to the Treasury in May 2015.

1. Vice President and Corporate Secretary, Asian Infrastructure Investment Bank

Sir Danny sought the Committee’s advice about an appointment as Vice President and Corporate Secretary of the Asian Infrastructure Investment Bank (AIIB).

The Committee noted that the AIIB is a newly created multilateral development bank with a focus on investment in infrastructure in Asia. They took into account that the UK Government actively supports the AIIB, is a shareholder and was one of its founding members. Bearing this in mind, and taking into account the views of Sir Danny’s former Department, the Committee believes that the usual lobbying ban for former Ministers should be waived in this case.

The Committee advised Sir Danny that it could see no reason why he should not take up this appointment, subject to the following condition:

- That he should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) any privileged information available to him as a Minister.

The Committee sent its [advice letter](#) to Sir Danny in February 2016 and the appointment was announced that month.

Lord German recused himself from this application.

Rt Hon Lord Barker

Lord Barker left his role as Minister of State in DECC and Minister for Business Engagement with India in July 2014.

1. Chair, Global Sustainability Practice, Gyro Ltd

Lord Barker sought the Committee's advice about taking up an appointment with Gyro Ltd, an advertising, communications and creative agency. The Committee noted that this is a paid role, amounting to three days' work per month.

When considering the application the Committee took into account that Lord Barker has a longstanding connection with Gyro Ltd, having been a small shareholder since 2007. It also took into account Lord Barker's statement that the role is not likely to require any contact or dealings with his former Department or government more generally. It noted that eighteen months had passed since he left his last ministerial position.

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

- He should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) 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 Gyro Ltd, its parent company Pegasus Capital Advisers LP, or their clients.

The Committee wrote its [advice letter](#) to Lord Barker in February 2016 and he took up the role later that month.

2. Environmental Defense Fund Ltd, Powerhive Inc and Equinox Energy Capital Ltd

Lord Barker sought the Committee's advice on appointments as: Director of the European Board of the Environmental Defense Fund Ltd; Senior Adviser to Powerhive Inc; and Senior Adviser to Equinox Energy Capital Ltd.

When considering these applications the Committee noted that Lord Barker had met with the Environmental Defense Fund while in office, as part of wider stakeholder engagement with leading US voices on climate change, but that he was unaware of any other relationship between them and his former Departments. The Committee noted that Lord Barker did not have any official dealings with Powerhive or Equinox Energy Capital during his last two years in ministerial office.

The Committee noted that these appointments were related to the area for which Lord Barker previously had ministerial responsibility, and that this may give rise to negative perceptions of these appointments. However, taking into account all the circumstances, the Committee saw no reason why he should not accept the appointments, subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him as a minister from his time in Government; and

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

The Committee wrote its [advice letter](#) to Lord Barker in August 2015.

Jeremy Browne

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

1. Senior Representative in Europe, City of London Corporation

Mr Browne sought the Committee's advice on taking up a paid appointment as Senior Representative in Europe with the City of London Corporation. The role involves representing the interests and views of the City and the wider financial services sector in the European Union, and Europe more widely.

The Committee took into account that Mr Browne had official dealings with his prospective employer whilst in office, but this would have been at least three years ago, and it was almost two years since his last day in Government. Mr Browne indicated that his role would involve interaction with the Government, although it would not involve lobbying. His former Departments, the Home Office and the Foreign Office, had no concerns about the proposed appointment.

The Committee saw no reason why he should not accept the appointment, subject to the conditions that:

- he should not draw on [disclose, or use for the benefit of himself or the City of London Corporation] any privileged information available to him from his time in Government; and
- for two years from his last day in office, he should not become personally involved in lobbying UK Government Ministers or Crown Servants, including Special Advisers, on behalf of the City of London Corporation, or the residents or the commercial interests it represents.

The Committee wrote its [advice letter](#) to Mr Browne in August 2015 and he took up the role in September 2015.

2. Independent consultancy and Honorary Professor with the University of Nottingham

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

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

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

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

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

Baroness Burt of Solihull

Baroness Burt of Solihull left her role as an Assistant Government Whip in May 2015.

1. Board Adviser, Total Training

Baroness Burt sought advice on accepting an appointment as a board adviser to Total Training, a construction training company.

When considering this application the Committee noted that Baroness Burt had had no dealings with the organisation in her role as a Whip, and there was no relationship between them and her former Department, although this was a company local to her former constituency and so she did have dealings with them in her capacity as an MP.

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

- She should not draw on (disclose or use for the benefit of herself or the organisations to which this advice refers) any privileged information available to her as a Minister; and
- For two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of Total Training, its parent company, subsidiaries or clients.

The Committee wrote its [advice letter](#) to Baroness Burt in October 2015.

Rt Hon Sir Vince Cable

Sir Vince Cable left his role as Secretary of State for Business, Innovation and Skills in May 2015.

1. London School of Economics (LSE), Richmond Adult Community College (RACC), DBA Speakers, and Health-Connected

Sir Vince sought the Committee's advice on taking up new roles as: Professor in Practice at LSE, Governor of RACC, panel member of DBA Speakers, and board member of Health-Connected.

When considering these applications the Committee noted that Sir Vince had no official dealings with DBA Speakers or Health-Connected in his ministerial role, and that any contact with LSE and RACC was through his broad oversight of higher and further education and, in the case of RACC, links to his former constituency as an MP. They further noted that those two appointments were unpaid.

The Committee also took into account the views of Sir Vince's former Department, BIS, which raised no concerns about any of the roles.

The Committee advised Sir Vince that it could see no reason why he should not take up these appointments, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) 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 LSE, Health-Connected, DBA Speakers or Richmond Adult Community College, or any of their partners, subsidiaries or clients.

The Committee wrote its [advice letter](#) to Sir Vince in January 2016.

Rt Hon Nick Clegg MP

Nick Clegg left his role as Deputy Prime Minister in May 2015.

1. Leading a Commission on Social Inequality, Social Market Foundation

Mr Clegg sought the Committee's advice on taking up a part-time role leading a commission on tackling inequality in education.

Taking into account all of the circumstances, including the fact that the role will not require Mr Clegg to lobby government and the fact that his former Department had no concerns regarding the propriety of this appointment, the Committee saw no reason why he should not take up the role, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him in his time 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 the Social Market Foundation, or any of its parent companies, subsidiaries, or clients.

The Committee wrote its [advice letter](#) to Mr Clegg in October 2015 and he took up the role in January 2016.

2. Commissioner, Global Commission on Drug Policy (GCDP)

Mr Clegg sought the Committee's advice on taking up a part-time, unpaid appointment with the GCDP leading a diplomatic project which will seek to encourage an evidence based approach amongst European leaders.

Taking into account all the circumstances, including the fact that his former Department had no concerns regarding the propriety of this appointment, the Committee advised Mr Clegg that it saw no reason why he should not accept this appointment subject to the following conditions:

- He should not draw on any privileged information available to him from his time 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 the GCDP, or any of its clients.

The Committee wrote its [advice letter](#) to Mr Clegg in October 2015 and the appointment was taken up in November 2015.

3. Columnist, London Evening Standard

Mr Clegg sought advice on accepting a role as a fortnightly columnist with the London Evening Standard. The Committee took into account that he had met with some of the newspaper's employees while in office, but that this was contact of a nature that would be expected with newspaper proprietors, including various interviews, and that there is no other relationship between his former Department and the newspaper.

4. Speaker, News Presenters Ltd

Mr Clegg sought to become a speaker with News Presenters Ltd, making speeches on an ad hoc basis, and being listed on their website. The

Committee noted that he had had no dealings with the organisation while in ministerial office.

5. Trustee, Social Mobility Foundation

Mr Clegg sought advice on accepting a role as a Trustee of the Social Mobility Foundation (SMF). When considering this, the Committee took into account that he had had some dealings with SMF while in office, as he hosted a work experience placement in his parliamentary office, that he had engaged with them on social mobility strategy, and that they had won the contract to deliver the Whitehall Social Mobility Internship Programme. However, they also noted that this is an unpaid role, would involve no contact with Government, and that Mr Clegg's former Department had no concerns.

6. Director, Open Reason

Mr Clegg sought advice on establishing a new, not for profit limited company, consisting of a policy and research team, to support his ongoing role as a public figure interested in promoting debate and fresh thinking. The Committee noted that this will not be a consultancy and will not engage in lobbying Government, or represent clients or organisations.

The Committee also considered Mr Clegg's initial commissions through this company, which would be from: Open Society Foundations, Virgin Group Holdings Ltd and the Resolution Trust.

Taking into account all the circumstances, including the fact that the three month standard waiting period for former Cabinet Ministers has already expired, the Committee advised Mr Clegg that it saw no reason why he should not accept these appointments subject to the following conditions:

- That he should not draw on [disclose or use for the benefit of himself or the organisations or persons to which this advice refers] 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 company, the Social Mobility Foundation, News Presenters Ltd, the London Evening Standard, or any of their parent companies, subsidiaries, or clients; and
- Once his new company is established, for two years from his last day in ministerial office, he should make a case to the Committee directly that each individual commission the company wishes to undertake would be permissible under the approved terms of the consultancy. (If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application).

The Committee's [advice letter](#) about these four appointments was sent to Mr Clegg in August 2015 and the appointments were first taken up in September 2015.

Rt Hon Sir Edward Davey

Sir Edward Davey left his role as Secretary of State for Energy and Climate Change in May 2015.

1. Non Executive Director, Nord Engine Capital

Sir Edward Davey asked for the Committee's advice about taking up a part-time, paid position as a non-Executive Director with Nord Engine Capital (NEC), a private equity investor.

When considering this application, the Committee took into account that during his last two years in office, Sir Edward did not have any official dealings with NEC nor was he aware of a relationship between NEC and his former Department. The Committee also noted that he did not have official dealings with competitors of his prospective employer.

The Committee also took into account that Sir Edward left ministerial office over seven months ago, and that his former Department had no propriety concerns regarding this application.

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

- That he should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) 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 Nord Engine Capital, its partners or its clients.

The Committee wrote its [advice letter](#) to Sir Edward in December 2015 and the appointment was announced in February 2016.

2. Consultant, MHP Communications

Sir Edward sought the Committee's advice about a role as a consultant for MHP Communications, assisting with the development of MHP's business and providing its clients with strategic advice on communications and government relations.

When considering this application, the Committee noted that Sir Edward did not have any contractual dealings with MHP or its competitors in his time as a Minister. It noted that EDF Energy, which Sir Edward had dealings with as a Minister, particularly in relation to Hinkley Point C, is a client of MHP.

However, Sir Edward was clear that he would not have any involvement with EDF whatsoever in relation to their generating business prior to the announcement of a final investment decision in relation to Hinkley Point C.

The Committee also took into account Sir Edward's assurance that he would not be required to lobby the UK Government on behalf of MHP or any of their clients in this role.

The Committee also took into account the views of Sir Edward's former Department, which did not have any concerns about the propriety of this appointment.

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

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him as a Minister;
- He should not involve himself in work related to Hinkley Point C or any commercial deal in which DECC is currently involved; 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 MHP Communications, its parent company or its clients.

The Committee's [advice letter](#) was sent to Sir Edward in December 2015 and the appointment was announced in January 2016.

3. Independent Consultancy and commission with Herbert Smith Freehills

Sir Edward asked for the Committee's advice about setting up an independent consultancy and accepting a commission under that consultancy with Herbert Smith Freehills (HSF), having left Government in May 2015.

Sir Edward's independent consultancy aims to provide consultancy services in the area of energy and climate change, covering the full spectrum of the energy industry – from renewables to offshore UKCS, from community energy to the UN climate change talks. His aim would be to help organisations to develop thought leadership in the energy and climate change sector, to understand past energy policies and to understand how future policy in the UK, the EU and elsewhere might develop.

The Committee took into account that Sir Edward had some dealings with HSF when they acted for Drax in Judicial Review proceedings against DECC. Sir Edward is not aware of any relationship between DECC and HSF, and during his last two years in office, he did not have any official dealings with any competitors of HSF. Finally, Sir Edward informed us that his consultancy work would not include any lobbying of the UK Government at any level and would not involve use of any confidential information gained as a Minister.

The Committee advised Sir Edward that it saw no reason why he should not establish the consultancy and take up this appointment, subject to the conditions that:

- he should not draw on privileged information available to him from his time in Government;
- a three month waiting period from his last day in Ministerial office;
- for two years from his last day in ministerial office, he should not become personally involved in lobbying UK Government on behalf of his new employer, its subsidiaries or its clients;
- he should not involve himself in work related to Hinkley Point C or any commercial deal in which DECC is currently involved; and
- once he has received approval to set up as an independent consultant, he must seek confirmation from the Committee directly that each subsequent 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.

John Wood recused himself from this case.

The Committee's [advice letter](#) was sent to Sir Edward in July 2015 and he took up the commission with HSF in September 2015.

4. Commission with Macquarie Bank

Sir Edward asked for the Committee's advice about accepting a new, part-time paid commission, under his consultancy, with Macquarie Bank.

Macquarie Bank is currently working with councils and housing associations, to fund and install solar PV on the roofs of their properties, in order to provide the tenants with cheap or free electricity. Sir Edward's role would be to advise the Macquarie team on how policy in this area and is likely to evolve, and how to identify the right councils, housing associations, people and arguments for the deployment of their business proposal.

He would work for 1.5 days a week, for 10 weeks, with the possibility of extension. In addition, he confirmed that for this commission, he would not draw on privileged information or become personally involved in lobbying the UK Government.

The Committee agreed that this appointment should be made subject to the conditions already imposed on his independent consultancy. The [letter](#) was sent to Sir Edward in August 2015 and he took up the new role in September 2015.

5. Chairman, Mongoose Energy

Sir Edward asked for the Committee's advice about taking up a part-time, paid appointment with Mongoose Energy as Chairman, having left Government in May 2015.

When considering Sir Edward's application, the Committee noted that Mongoose Energy grew out of Bath & West Community Energy (BWCE) who

did, and still do, have a relationship with DECC. However, Sir Edward's former Department have advised that as Secretary of State, Sir Edward would have met many individuals from the sector during his normal course of business, including those from Mongoose Energy.

The Committee does not believe this appointment could reasonably be interpreted as a reward for decisions he or his former Department had made while Sir Edward held ministerial office. However, given the links, between DECC and Mongoose Energy and the possible public perception of the appointment, it is of the view that a waiting period in addition to the standard three-month waiting period for former Cabinet-level Ministers would be appropriate in this instance.

The Committee sees no reason why Sir Edward should not take up this appointment, subject to the following conditions:

- A six month waiting period from his last day in ministerial office;
- for two years from his last day in office, he should not become personally involved in lobbying the UK Government on behalf of Mongoose Energy, its parent companies, its subsidiaries, or its clients; and
- He should not draw on [disclose or use for the benefit of himself or the organisations or persons to which this advice refers] any privileged information available to him as a Minister from his time in Government.

The Committee's [advice letter](#) was sent in September 2015 and the appointment was announced later that month.

Lord de Mauley

Lord de Mauley left his role as Parliamentary Under Secretary, Defra, in May 2015.

1. Panel Member, Youd Andrews

Lord de Mauley sought the Committee's advice about taking up a paid, part-time appointment with the sales consultancy Youd Andrews.

When considering this application, the Committee noted that he had no dealings with the organisation while in ministerial office, and that he informed the Committee that the role will not involve lobbying government. Lord de Mauley's former Department had no propriety concerns with this appointment. The Committee advised Lord de Mauley that it saw no reason why he should not take up this appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him in his time 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 Youd

Andrews, their partners or clients.

The Committee wrote its [advice letter](#) to Lord de Mauley in November 2015, and he took up the appointment in January 2016.

2. Trustee, Horse Trust

Lord de Mauley sought the Committee's advice about becoming a trustee of the Horse Trust.

When it considered this application, the Committee noted that Lord de Mauley had some dealings with the charity while he was a Minister in Defra. However, it took into account that this is an unpaid role and would not require him to lobby government.

The Committee advised Lord de Mauley that it saw no reason why he should not take up this appointment, subject to the conditions that:

- He should not draw on any privileged information available to him in his time 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 the Horse Trust.

The Committee wrote its [letter of advice](#) in November 2015 and Lord de Mauley took up the role in June 2016.

Lord Deighton

Lord Deighton left his role as Commercial Secretary to the Treasury in May 2015.

1. Executive Chairman, Heathrow Airport Holdings Ltd

Lord Deighton sought the Committee's advice about an appointment as Executive Chairman of Heathrow Airport Holdings Ltd, the owner and operator of Heathrow Airport.

When considering this application the Committee noted that Lord Deighton had left his ministerial position in HM Treasury nine months earlier. The Committee also noted that HM Treasury had found no records of submissions or advice indicating that Lord Deighton had access to commercially sensitive information or unannounced government policy relevant to Heathrow Airport. However, the Committee was clear that a two year lobbying restriction should apply in this case.

The Committee advised Lord Deighton that it could see no reason why he should not take up this appointment, subject to the following conditions:

- That he should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) 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 Heathrow Airport Holdings Ltd. (In particular he should not use his Whitehall contacts to influence policy or secure business).

The Committee wrote its [advice letter](#) to Lord Deighton in February 2016 and the appointment was announced in March 2016.

2. Non Executive Director, Holdingham Group

Lord Deighton sought the Committee's advice about a part-time, paid appointment with Holdingham Group, as a Non Executive Director. The Committee took into account that he had had no dealings with Holdingham Group during his last two years in ministerial office, and that he was unaware of any relationship between the organisation and his former Department.

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

- he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him from his time 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 Holdingham Group Ltd, its subsidiaries, partners or its clients.

The Committee wrote its [advice letter](#) to Lord Deighton in November 2015 and the appointment was announced in December 2015.

Mary Jo Jacobi and Baroness Liddell recused themselves from this case.

3. Chairing a Governance Review, International Association of Athletics Federations (IAAF)

Lord Deighton sought the Committee's advice about a part-time, paid appointment with the IAAF, the world governing body of athletics. The Committee noted that this role would involve chairing a review of the organisation's systems and controls, and how to establish the best practices in class governance.

When considering this application, the Committee took into account that, during his last two years in office, Lord Deighton had no official dealings with IAAF and was not aware of a relationship between IAAF and his former Department. His former Department, HM Treasury, had no concerns regarding the propriety of this appointment.

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

- he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him from his time 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 IAAF or its members.

The Committee wrote its [advice letter](#) to Lord Deighton in November 2015 and the appointment was taken up that month.

Rt Hon Sir Alan Duncan MP

Sir Alan Duncan left his role as Minister of State, Department for International Development, in July 2014.

1. Non Executive Director, Fujairah Refining Ltd

Sir Alan sought the Committee's advice about an appointment as a Non Executive Director for Fujairah Refining Ltd.

When considering this application, the Committee noted that the majority shareholder of Fujairah Refining Ltd is Vitol, and that Sir Alan had some contact with that organisation while in ministerial office. However, the Committee took into account that Sir Alan had left ministerial office over 18 months ago, and that this contact was more than two years before that. They also took into account Sir Alan's previous career in the oil industry and the fact that he had carried out work for Vitol prior to becoming a Minister. The Committee also noted that Sir Alan had had no access to commercially sensitive information about any competitors of the organisation during his last two years in office and that his new role would not involve any contact with the UK Government.

Taking into account the views of Sir Alan's former Department and the FCO, given that he continues to hold a role as a Special Envoy to Yemen, the Committee saw no reason why he should not take up this appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him as a Minister or Special Envoy;
- He should make it clear in any activities he undertakes on behalf of his new employer, its parent company, subsidiaries or 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 Fujairah

Refining Ltd, its parent company, subsidiaries or clients.

The Committee wrote its [advice letter](#) to Sir Alan in January 2016 and he took up the role in February 2016.

Lord Foster

Lord Foster of Bath left his role as Deputy Chief Whip in May 2015.

1. Associate, Global Partners Governance

Lord Foster sought retrospective advice about an appointment he had taken up with Global Partners Governance (GPG). The Committee wrote to Lord Foster registering its concern that his application was submitted some time after he had accepted and taken up the role, and that the business appointment rules specify that retrospective applications are not normally accepted. The Committee noted that Lord Foster had apologised unreservedly for the oversight on his part, however, to fulfil the remit given to it by Government the Committee needs to be able to consider an application fully and freely before offering its advice. This is impossible to do in a way that will command public confidence if an appointment has already been taken up. Therefore, the Committee was unwilling to give retrospective approval for the appointment.

The Committee formally recorded that:

- Lord Foster had informed the Committee that his role is as an Associate with GPG, and involves working on an ad hoc basis with their Iraq Team;
- He informed the Committee that he had no contact with GPG, any of its competitors, or the sector in which it operates during his last two years in ministerial office;
- He assured the Committee that his role does not involve any lobbying of Government; and
- The Committee had been informed that Lord Foster's former Department has no commercial relationship with GPG.

The Committee also drew Lord Foster's attention to the normal restriction imposed prohibiting the misuse of privileged information obtained while in public office.

The Committee wrote its [letter](#) to Lord Foster in February 2016.

Helen Grant MP

Helen Grant left her role as Parliamentary Under-Secretary of State, DCMS, in May 2015.

1. Trustee, Human Trafficking Foundation

Ms Grant sought advice about a part-time, unpaid appointment as a Trustee of the Human Trafficking Foundation, a UK-based charity which grew out of the work of the All Party Parliamentary Group on Human Trafficking. When considering this application the Committee noted that the role would involve attending about four meetings a year and preparing Parliamentary Questions from time to time, and that Ms Grant may also speak in debates on human trafficking and sponsor relevant events.

The Committee noted that this is an unpaid appointment with a charity that aims to fight modern day slavery and human trafficking, and which works closely with the Foreign and Home Offices.

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

- She should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time as a Minister; and
- For two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of the Human Trafficking Foundation.

The Committee noted that these conditions do not apply to Ms Grant's activities in Parliament, which are subject to other rules.

The Committee wrote its [advice letter](#) to Ms Grant in March 2016 and she took up the role in April 2016.

2. Honorary Patron, Women in Racing (WIR)

Ms Grant sought advice about a part-time, unpaid appointment with Women in Racing, an organisation that seeks to develop the profile of women in the sport of horse racing.

When considering this application, the Committee took into account that there is a relationship between DCMS and WIR, and that Ms Grant had some official dealings with them while in office. However, they noted that any contact Ms Grant had formed part of her ministerial duty in promoting women in sport, and DCMS's relationship with the organisation was based on cooperating on this issue. They also noted that this was an unpaid role, and DCMS had no concerns about the appointment.

The Committee advised Ms Grant that it saw no reason why she should not accept this appointment subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her from her time as a Minister; and

- for two years from her last day in ministerial office, she should not become personally involved in lobbying the UK Government on behalf of Women in Racing, its partners or any of its clients.

The Committee wrote its [advice letter](#) to Ms Grant in August 2015. Baroness Browning recused herself from this case.

Lord Green of Hurstpierpoint

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

1. Member of the Steering Committee, Centre for Financial Excellence, Sabanci University

Lord Green sought advice on accepting an appointment as member of the Steering Committee at the new Centre for Financial Excellence at Sabanci University.

When considering this application, the Committee took into account that Lord Green did not have any direct official dealings with Sabanci University during his last two years in office and had stated that this role would not involve lobbying the UK Government.

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

- he should not draw on any privileged information available to him from his time in Government; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of Sabanci University and its Centre for Financial Excellence or The Sabanci Foundation.

The Committee wrote its [advice letter](#) to Lord Green in June 2015 and he took up the role on 1 July 2015.

Rt Hon Lord Hague of Richmond

Lord Hague left his role as First Secretary of State and Leader of the House of Commons in May 2015.

1. Non-Executive Director, Intercontinental Exchange, Inc. (ICE)

Lord Hague sought permission to accept a part-time, paid appointment as Non-Executive Director at ICE.

When considering this, the Committee took into account that Lord Hague did not have any direct official dealings with ICE whilst he was in ministerial office. They also noted that his former Department had no concerns about the appointment.

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

- he should not draw on any privileged information available to him from his time in Government; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of Intercontinental Exchange, Inc. (ICE), ICE Futures Europe, its subsidiaries, partners or clients.

The Committee wrote its [advice letter](#) to Lord Hague in July 2015 and the appointment was announced in September 2015.

2. Chairman, Royal United Services Institute

Lord Hague sought permission to accept an unpaid role as Chairman of the Royal United Services Institute (RUSI).

When considering this, the Committee took into account that Lord Hague had some contact with RUSI while in office, as he gave a speech to the organisation while Foreign Secretary, and that, as a leading think tank, RUSI has occasional discussions and meetings with officials from the FCO. However, they also noted that his former Departments had no concerns about this appointment.

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

- a three month waiting period 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 ministerial office, he should not become personally involved in lobbying the UK Government on behalf of RUSI, or any customers or clients of the organisation.

The Committee wrote its [advice letter](#) to Lord Hague in June 2015 and the appointment was announced in July 2015.

3. Chairman of International Advisory Group, Linklaters LLP

Lord Hague sought permission to accept a paid role as Chairman of the International Advisory Group at Linklaters. The Committee took into account that Lord Hague did not have any direct official dealings with Linklaters, or any of their competitors, in his last two years of ministerial office, nor any significant ones prior to that. Furthermore, he was not involved in policy

development, the award of grants, or any regulatory work that could have affected the organisation.

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

- a three month waiting period 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 ministerial office, he should not become personally involved in lobbying the UK Government on behalf of Linklaters, and any subsidiaries, or any customers or clients of the organisation.

The Committee wrote its [advice letter](#) to Lord Hague in June 2015 and it was announced in July 2015.

4. Senior Advisor, Teneo Holdings

Lord Hague sought permission to accept a paid role as a Senior Advisor at Teneo. The Committee took into account that Lord Hague did not have any direct official dealings with Teneo, or any of their competitors, in his last two years of ministerial office, nor any significant ones prior to that. Furthermore, he was not involved in policy development, the award of grants, or any regulatory work that could have affected the organisation.

The Committee noted with concern that unofficial reports about this role had appeared in the press before it could give its advice. However, Lord Hague notified the committee that no contract had been signed prior to advice being sought, and that he did not believe the information in the press originated from either him or Teneo.

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

- a three month waiting period 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 ministerial office, he should not become personally involved in lobbying the UK Government on behalf of Teneo, and any subsidiaries, or any customers or clients of the organisations.

The Committee wrote its [advice letter](#) to Lord Hague in June 2015 and it was announced in July 2015.

Stephen Hammond MP

Stephen Hammond left his role as Parliamentary Under-Secretary of State for Transport in July 2014.

1. Adviser, Confederation of Passenger Transport

Stephen Hammond sought the Committee's advice about taking up a paid appointment as an adviser to the Confederation of Passenger Transport. The Committee noted that Mr Hammond had been offered a role as an adviser, and that he had acted in a similar capacity for the Confederation of Passenger Transport between 2010 and 2012 prior to joining the Government. Given his previous Ministerial position at the Department for Transport, the Committee drew attention to the ban on lobbying and drawing on privileged information set out below.

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

- That Mr Hammond should not draw on any privileged information available to him as a Minister; and
- For two years from his last day in service, Mr Hammond should not become personally involved in lobbying the UK Government on behalf of his new employer or its members.

The Committee wrote its [advice letter](#) to Mr Hammond in January 2016 and he took up the role later that month.

Rt Hon Sir Simon Hughes

Sir Simon Hughes left his role as Minister of State, Ministry of Justice, in May 2015.

1. Head of Public Affairs, The Open University

Sir Simon Hughes sought the Committee's advice about taking up an appointment with The Open University (the OU). The Committee noted that this is a full time, paid role and that Sir Simon would hold the position for a year.

When considering the application the Committee noted that nine months had passed since Sir Simon left ministerial office. It was also mindful that Sir Simon was taking up a role that reflects and furthers an interest in maximising access to education, which pre-dates his ministerial role.

The Committee took into account that there is no link between this position and Sir Simon's previous ministerial duties. The Committee noted that the role will not involve lobbying of government on any matters concerning public funding of the OU or any lobbying at all of his former Department, the Ministry of Justice.

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

- That he should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) 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 The Open University except that in this case the Committee accepts that he may need to engage with government on educational and other issues and in the normal course of university business as opposed to issues relating to the public funding of The Open University or its students.

The Committee wrote its [advice letter](#) to Sir Simon in February 2016, following which he took up the role with the OU.

Norman Lamb MP

Norman Lamb left his role as Minister for Care and Support, Department of Health, in May 2015.

1. Board Member, Think Ahead

Mr Lamb sought the Committee's advice about an unpaid appointment as a Board Member of Think Ahead, a programme set up to attract and develop mental health social workers.

The Committee sought the views of Mr Lamb's former Department, which did not have any concerns regarding the propriety of the appointment.

Taking into account the specific facts in this case, the Committee advised Mr Lamb that it saw no reason why he should not take up the appointment, subject to the following conditions:

- That he should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) 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 Think Ahead, except that in this case the Committee accepts that this would not prevent contact with Government pursuant to his role with Think Ahead but would prevent his involvement in any competitive tendering or bidding processes while carrying out this role.

The Committee wrote its [advice letter](#) to Mr Lamb in February 2016 and he took up the new role in March 2016.

2. Chair, Mental Health Commission, West Midlands Combined Authority

Mr Lamb sought the Committee's advice about an appointment as Chair of a Mental Health Commission for the West Midlands Combined Authority

(WMCA). The Committee noted that this is a paid position, lasting for nine months.

The Committee noted its concern that this appointment was announced before it had the opportunity to provide its advice. Nonetheless, it sought the opinion of Mr Lamb's former Department, which did not have any concerns regarding the propriety of this appointment. Had the appointment not been announced before the Committee could offer its advice, the Committee would have advised that it saw no reason why he should not take up the appointment subject to the following conditions:

- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of the WMCA or its constituent members. This is not intended to prevent him reporting to Government on the activities of the Commission or submitting recommendations to Government pursuant to his role as Chairman; and
- he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him in his time as a Minister.

The Committee wrote its [letter](#) to Mr Lamb in January 2016.

Rt Hon Lord Lansley

Lord Lansley left his role as Leader of the House of Commons and Lord Privy Seal in July 2014.

1. Chair, UK-Japan 21st Century Group

Lord Lansley sought the Committee's advice on a part-time, unremunerated role as Chair of the UK-Japan 21st Century Group, which aims to promote dialogue and cooperation between the two countries.

When considering this application, the Committee noted that Lord Lansley did not have any official dealings with the Group in his last two years in office. They also noted that his former Departments, Cabinet Office and Department of Health, had no propriety concerns regarding this application.

The Committee saw no reason why Lord Lansley should not take up this appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) privileged information available to him from his time 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 the UK-Japan 21st Century Group or its members. This is not intended to prevent him reporting generally with regard to the activities of the group and its meetings or submitting such reports to Government pursuant to his role of

Chairman.

The Committee wrote its [advice letter](#) to Lord Lansley in November 2015 and the appointment was taken up that month.

2. Associate, Low Associates

Lord Lansley sought the Committee's advice about taking up a part-time appointment with Low Associates.

When considering this application, the Committee took into account that Low Associates is founded by Lord Lansley's wife, Sally Low. It also noted that Lord Lansley was an associate with Low Associates before becoming a Minister and, although he did not do any work for the company whilst holding Ministerial office, his position was declared throughout the time that he was a Minister.

Lord Lansley's former Departments, Cabinet Office and Department of Health, have no propriety concerns regarding this appointment.

The Committee sees no reason why Lord Lansley should not take up this appointment, subject to the following conditions:

- he should not draw on any privileged information available to him from his time as a Minister;
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government; and
- before accepting any commissions from Low Commissions, he should seek the Committee's advice on each commission he wishes to undertake.

The Committee wrote its [advice letter](#) to Lord Lansley in June 2015 and he took up the appointment in October 2015.

3. Adviser, UK Active

Lord Lansley sought the Committee's advice about accepting a part-time, paid appointment with UK Active.

When considering this application, the Committee took into account that as Secretary of State, Lord Lansley initiated the responsibility deal, a voluntary partnership between Government, the health sector and industry. A strand of this was the promotion of physical activity and UK Active joined this in March 2011. However, the Committee noted that Lord Lansley's contact with UK Active, as Secretary of State, was in the wider context of the health programme and, during his last three years in office, he did not have official dealings with either UK Active or their competitors.

Lord Lansley's former Departments, Cabinet Office and Department of Health have confirmed there are no propriety concerns with this appointment.

The Committee sees no reason why Lord Lansley should not take up this appointment, subject to the following conditions:

- He should not draw on any privileged information available to him from his time 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

The Committee wrote its [advice letter](#) to Lord Lansley in June 2015 and he took up the appointment in August.

4. Consultant, Bain & Company

Lord Lansley sought the Committee's advice about accepting a part-time, paid appointment with Bain & Company.

When considering this application, the Committee took into account that Lord Lansley did not have any direct, official dealings with Bain during his last two years in office. The Committee also noted that his former Departments, Cabinet Office and Department of Health, had no propriety concerns regarding this appointment.

The Committee sees no reason why Lord Lansley should not take up this appointment, subject to the following conditions:

- That he should not draw on any privileged information available to him from his time in Government; and
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the Government on behalf of Bain & Company, their subsidiaries, partners or clients.

The Committee wrote its [advice letter](#) to Lord Lansley in July 2015 and the appointment was taken up in August 2015.

5. Adviser/Consultant, The Blackstone Group International Partners LLP

Lord Lansley sought the Committee's advice about a part-time, paid appointment with Blackstone, a global investment firm advising institutional investors.

When considering this application, the Committee took into account that Lord Lansley had no official dealings with Blackstone during his last two years in office and is not aware of a relationship between his former Departments and Blackstone. The Committee also noted that Lord Lansley did not have any dealings with competitors of Blackstone.

Taking into account the circumstances, and the views of Lord Lansley's former Departments, Cabinet Office and Department of Health, who had no propriety concerns, the Committee sees no reason why Lord Lansley should not take up this appointment, subject to the following conditions:

- He should not draw on any privileged information available to him from his time 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 The Blackstone Group International Partners LLP, its parent companies, subsidiaries, partners or clients.

The Committee wrote its [advice letter](#) to Lord Lansley in July 2015.

6. Speaker, Dod's Training

Lord Lansley sought the Committee's advice about accepting a part-time, paid appointment with Dod's Training carrying out occasional speaking engagements.

When considering this application, the Committee took into account that Lord Lansley did not have any official dealings with Dod's or its competitors during his last two years in office. They also noted that his former Departments, Cabinet Office and Department of Health had no propriety concerns regarding this appointment.

The Committee sees no reason why Lord Lansley should not take up this appointment, subject to the following conditions:

- He should not draw on any privileged information available to him from his time in Government; and
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government

The Committee wrote its [advice letter](#) to Lord Lansley in June 2015 and he took up the appointment that month.

David Laws

David Laws left his role as Minister of State for Schools and Minister of State in the Cabinet Office in May 2015.

1. Chair of the Advisory Board and Trustee, UPP Foundation

Mr Laws sought the Committee's advice about taking up a part-time, unpaid appointment with a new foundation being established by the University Partnerships Programme (UPP). The Committee noted that Mr Laws's role would be to offer advice on how the foundation should use its money to support charitable strategic priorities.

The Committee took into account that Mr Laws did not have any official dealings with UPP whilst in office and is not aware of a relationship between UPP and his former Department.

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

- he should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) any privileged information available to him as a Minister; and
- for two years from his last day in ministerial office, he should not lobby the Government on behalf of UPP Ltd, its new foundation, their subsidiaries, their partners or their clients.

The Committee wrote its [advice letter](#) in October 2015 and the appointment was announced in April 2016.

2. Advisory Council Member, Future First

Mr Laws sought the Committee's advice about an appointment as an Advisory Council Member of Future First, an education charity. The Committee noted that this is a part-time, unpaid role.

The Committee took into account that while Department for Education has an on-going relationship with Future First, Mr Laws did not anticipate that the role would require any contact or dealings with his former Department or government more generally.

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

- he should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) 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 Future First or its partners.

The Committee wrote its [advice letter](#) to Mr Laws in January 2016 and he took up the role later that month.

3. Trustee, Teacher Development Trust

Mr Laws sought the Committee's advice on a part-time, unpaid appointment as a Trustee of the Teacher Development Trust, an independent charity founded by teachers.

When considering this application, the Committee took into account that, while a Minister, Mr Laws was involved in the appointment of the CEO of the Teacher Development Trust to chair an expert group. However, his former Department has been clear that the appointment was a natural fit, and any interaction between the Department and the Trust had been limited and clearly justified.

The Committee further noted that this post is unpaid.

Taking into account all of the circumstances, the Committee saw no reason why Mr Laws should not take up this appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) any privileged information available to him from his time 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 the Teacher Development Trust or its partners.

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

4. Adviser, Ark

Mr Laws sought the Committee's advice on a part-time, paid appointment with Ark, working for their international division which aims to improve education in the developing world.

Taking into account all of the circumstances, including the fact his former Departments, Cabinet Office and Department for Education, had no propriety concerns, the Committee saw no reason why Mr Laws should not take up this appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) any privileged information available to him from his time as a Minister;
- He should not advise on, or otherwise involve himself in, Ark or Ark Schools' operations in the UK; 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 Ark and its international division, its subsidiaries, or its clients.

The Committee wrote its [advice letter](#) to Mr Laws in September 2015 and the appointment was taken up in November 2015.

Lord Livingston of Parkhead

Lord Livingston of Parkhead left his role as Minister of State for Trade and Investment in May 2015.

1. Non Executive Director/Non Executive Chairman, Man Group

Lord Livingston sought the Committee's advice about a part-time, paid appointment with Man Group, an investment/fund manager. He would initially

act as a Non Executive Director, before taking over as Non Executive Chairman.

When considering this application, the Committee took into account that Lord Livingston had no official dealings with Man Group during his last two years in office. Although he had dealings with a range of fund managers, none were direct competitors of Man Group. The Committee noted that his former Departments, FCO and BIS, had no propriety concerns regarding this appointment.

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

- he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him from his time 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 Man Group, its partners or its clients.

The Committee wrote its [advice letter](#) to Lord Livingston in November 2015 and the appointment was taken up in December 2015.

Baroness Browning recused herself from this case.

2. Deputy Chairman, Dixons Carphone Plc

Lord Livingston sought the Committee's advice about a part-time, paid appointment as Deputy Chairman of Dixons Carphone, a consumer electronics and mobile phone retailer.

When considering this application, the Committee took into account that this is non-executive role and during his last two years in office, Lord Livingston had no official dealings with Dixons Carphone and is not aware of a relationship between them and his former Departments (FCO and BIS). His former Departments had no propriety concerns with this appointment.

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

- he should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) any privileged information available to him from his time 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 Dixons Carphone Plc, its subsidiaries or customers.

The Committee wrote its advice letter to Lord Livingston in December 2015, and the appointment was announced later that month.

Baroness Browning recused herself from this case.

3. Non Executive Director/Chairman of Audit Committee, Belmond Ltd

Lord Livingston sought the Committee's advice about a part-time, paid appointment with Belmond, a hotel and leisure company. He would initially act as a Non-Executive Director, before taking over as the future Chairman of their Audit Committee.

When considering this application, the Committee took into account that Lord Livingston had no official dealings with Belmond during his last two years in office. It noted that, although he had some contact with a competitor of Belmond while in office, this contact was through his involvement in a trade mission to China, and Lord Livingston had provided his assurance that no sensitive information was exchanged on the visit. Furthermore, the Committee noted that his former Departments, FCO and BIS, had no propriety concerns regarding this appointment.

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

- he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him from his time 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 Belmond, its parent company, subsidiaries or clients.

The Committee wrote its [advice letter](#) to Lord Livingston in October 2015 and the appointment was taken up in November 2015.

Baroness Browning recused herself from this case.

4. Non Executive Director, Jewish Care

Lord Livingston sought the Committee's advice about taking up an unpaid, part-time appointment with Jewish Care, a charity that provides health and social welfare support services for vulnerable members of the Jewish community. He would act as a Non-Executive Director on the board of Trustees.

When considering this application, the Committee noted that Lord Livingston had no official dealings with Jewish Care during his last two years in office and that the role would not require him to lobby government. Furthermore the Committee noted that his former Departments, FCO and BIS, had no propriety concerns regarding this appointment.

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

- he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him from his time 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 Jewish Care, its parent company, subsidiaries or clients.

The Committee wrote its [advice letter](#) to Lord Livingston in October 2015 and the appointment was taken up in November 2015.

Baroness Browning recused herself from this case.

Rt Hon Esther McVey

Esther McVey left her role as Minister of State for Employment in May 2015.

1. Chair, British Transport Police Authority

Ms McVey sought advice on a role as Chair of the British Transport Police Authority (BTPA), the independent body responsible for ensuring an efficient and effective police force for rail operators, their staff and passengers.

The Committee noted its concern that this appointment was announced before it had the opportunity to provide its advice. Had the appointment not been announced before the Committee could offer its advice, the Committee would have advised that it saw no reason why she should not take up the appointment subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her as a Minister; and
- while the Committee recognised that her responsibilities as Chair will include representing BTPA in discussions with the Department for Transport, she should not otherwise, for two years from her last day in ministerial office, become involved in lobbying the UK Government on behalf of BTPA.

The Committee wrote its [letter](#) to Ms McVey in December 2015.

2. Special Advisor, Floreat Group

Ms McVey sought advice on accepting a part time role as a Special Advisor with Floreat Group, an independent private investment office.

The Committee noted that Ms McVey did not have any direct dealings with the organisation or any of their competitors while in post, and that her former Department had no concerns with this appointment.

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

- She should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her in her time as a Minister;
- For two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of the organisations to which this advice refers, their parent companies, subsidiaries or clients.

The Committee wrote its [advice letter](#) to Ms McVey in November 2015 and she took up the appointment that month.

3. Senior Consultant, Hume Brophy

Ms McVey sought advice on accepting a part time role as a Senior Consultant for Hume Brophy, an international communications firm.

The Committee noted that Ms McVey did not have any direct dealings with the organisation or any of their competitors while in post, and that her former Department had no concerns with this appointment.

The Committee noted that her role would involve having responsibility for communications, media strategy and planning for clients. Given the nature of the work that Hume Brophy carry out, the Committee particularly stressed the lobbying ban in relation to this appointment.

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

- She should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her in her time as a Minister;
- For two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of the organisations to which this advice refers, their parent companies, subsidiaries or clients.

The Committee wrote its [advice letter](#) to Ms McVey in November 2015 and she took up the appointment that month.

4. Visiting Lecturer, University of Liverpool

Ms McVey sought to accept a position as a visiting lecturer with the university, working for one day per month.

The Committee noted that Ms McVey did not have any direct dealings with the organisation or any of their competitors while in post, and that her former Department had no concerns with this appointment.

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

- She should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her in her time as a Minister;
- For two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of the organisations to which this advice refers, their parent companies, subsidiaries or clients.

The Committee wrote its [advice letter](#) to Ms McVey in November 2015 and she took up the appointment that month.

5. Fellowship, University of Hull

Ms McVey sought to engage in a fellowship with the University of Hull, which would involve a time commitment of around five days per month.

The Committee noted that Ms McVey did not have any direct dealings with the organisation or any of their competitors while in post, and that her former Department had no concerns with this appointment.

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

- She should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her in her time as a Minister;
- For two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of the organisations to which this advice refers, their parent companies, subsidiaries or clients.

The Committee wrote its [advice letter](#) to Ms McVey in November 2015 and she took up the appointment that month.

Rt Hon Baroness Northover

Baroness Northover left her role as Parliamentary Under Secretary of State, DFID, in May 2015.

1. Visiting Professor, Institute of Global Health Innovation (IGHI)

Baroness Northover sought the Committee's advice about a role as a Visiting Professor at the Institute of Global Health Innovation (IGHI). IGHI is part of Imperial College London and works to design and diffuse high impact global healthcare innovations and to reduce health inequalities worldwide.

The Committee noted that the appointment is a part-time, unpaid position to assist with research and teaching, and that DFID had no concerns about the position.

The Committee acknowledged that members of staff of Imperial College will have bid for DFID funds in the past and led DFID-funded programmes (and will continue to do so in future). However, the Committee agreed with the Department that neither of these factors represented a conflict of interest in the context of this appointment with IGHI. The Committee additionally noted that the role will not include any lobbying of Government.

Therefore, the Committee recommended that there was no reason why she should not take up the appointment, subject to the conditions that:

- Baroness Northover should not draw on any privileged information available to her from her time in Government; and
- for two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of IGHI or Imperial College London.

While recognising that her appointment will be part-time and unpaid, given the relationship between DFID and IGHI/Imperial, set out above, the Committee felt that it is worth adding, to avoid any perception that this might be the case, that Baroness Northover should not advise IGHI/Imperial on any bids for DFID funding.

The [letter](#) containing the final advice was sent in August 2015, and she took up the appointment in January 2016.

Rt Hon Owen Paterson MP

Owen Paterson left his role as Secretary of State for Environment, Food and Rural Affairs in July 2014.

1. Consultant, Randox Laboratories Ltd

Mr Paterson asked for the Committee's advice about taking up a part-time, paid appointment with Randox Laboratories Ltd, having left Government in July 2014. The Committee considered that fact that Mr Paterson's contact with Randox began when he was Shadow Secretary of State for Northern Ireland and then as Secretary of State for Northern Ireland, in the context of the debate about the devolution of responsibility for corporation tax to the Northern Ireland Assembly. This involved making a range of contacts with businesses across Northern Ireland during which he met and visited Randox.

Mr Paterson was Secretary of State at Defra from 2012-2014, in which capacity he stated that he did not have any official dealings with Randox, or its parent company. Since leaving Defra in 2014 he was invited back to

Northern Ireland to become involved in the corporation tax campaign and met Randox again.

Mr Paterson is not aware of any relationship, either contractual or non contractual between Randox and his former Departments. Although Randox will have engagement with government in pursuit of its business, he has informed us that it will not be part of his role with the company to be involved in such engagement.

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

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

The Committee wrote its [advice letter](#) to Mr Paterson in July 2015 and he took up the role in August 2015.

Rt Hon Sir Eric Pickles MP

Sir Eric Pickles left his role as Secretary of State for Communities and Local Government in May 2015.

1. Non-executive director, Leo Group Ltd

Sir Eric sought the Committee's advice about an appointment as a non-executive director of Leo Group Ltd, a recycling and waste management company.

When it considered this application the Committee took into account that Sir Eric proposed to take up an appointment in a sector that did not fall within his Ministerial remit at DCLG and had no link to his on-going Governmental roles. The appointment is not likely to include any contact or dealings with DCLG or with Government more generally.

The Committee advised Sir Eric that it could see no reason why he should not take up this appointment, subject to the following conditions:

- That he should not draw on any privileged information available to him as a Minister or in any capacity in which he continues to represent the UK Government;
- For two years from his last day in Ministerial office, he should not become personally involved in lobbying the UK Government on behalf of Leo Group Ltd, its subsidiaries or its clients; and

- He should make it clear in any activities he undertakes on behalf of Leo Group Ltd, its subsidiaries or clients that he is acting as their representative and not as a Government representative.

The Committee wrote its [advice letter](#) to Sir Eric in March 2016 and the appointment was taken up in April 2016.

Dan Rogerson

Dan Rogerson left his role as Parliamentary Under Secretary of State in the Department for Environment, Food and Rural Affairs in May 2015.

1. Chair, Wessex Water Partnership

Mr Rogerson sought the Committee's advice about accepting a role as Chair of the Wessex Water Partnership, a customer panel that was set up to offer challenge and scrutiny to the board of Wessex Water.

When considering this application the Committee took into account that, as the Minister responsible for water in Defra, Mr Rogerson did have some dealings with Wessex Water, and will have taken decisions that affected them. However, the Committee sought the views of his former Department, which confirmed that his decisions while in office will have affected all in the water industry equally, and that there is no way he could be seen to have favoured Wessex Water.

However, given Mr Rogerson's former responsibilities as a Minister, the Committee believed that it was appropriate for there to be a gap between that role and his new position.

The Committee advised Mr Rogerson that there was no reason why he should not accept this appointment subject to the following conditions:

- He should not take up the post until 1 January 2016;
- He should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) 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 UK Government on behalf of his new employer, its parent company or its clients

The Committee wrote its [advice letter](#) to Mr Rogerson in October 2015 and the appointment was announced in December 2015.

Mark Simmonds

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

1. Adviser, Bechtel

Mr Simmonds sought advice about a part-time, paid appointment with Bechtel, a global engineering, construction and project management company.

When considering this application, the Committee took into account that in his last two years in office, Mr Simmonds did meet Bechtel, as the company wanted to explain what its activities were around the world and to see how best it could use its UK-based expertise in developing markets. However, they also noted that Mr Simmonds was not involved in any Departmental policy, the award of grants or regulatory work affecting Bechtel, and that the FCO had no concerns with this appointment.

The Committee also took into account that it is now over 14 months since Mr Simmonds left ministerial office.

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

- he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him from his time 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 Bechtel, its subsidiaries, partners or clients.

The Committee wrote its [advice letter](#) to Mr Simmonds in November 2015 and the appointment was taken up in December 2015.

2. Honorary Vice President, Fauna and Flora International

Mr Simmonds sought advice about accepting an unpaid appointment as an Honorary Vice President of Fauna and Flora International (FFI), a conservation organisation.

The Committee took into account that Mr Simmonds did not have any official dealings with FFI during his last two years in office, and that he was unaware of any relationship between them and his former Department.

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

- he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him from his time 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 FFI or its partner organisations.

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

3. Non Executive Director, African Potash

Mr Simmonds sought advice about accepting a part time role as a Non Executive Director for African Potash.

The Committee noted that Mr Simmonds did not have any contact with African Potash while in office and that his new role would not require him to lobby government.

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

- he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him from his time 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 African Potash or any of its clients.

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

Jo Swinson

Jo Swinson left her role as Minister for Employment Relations and Consumer Affairs in May 2015.

1. Independent Consultant

Ms Swinson sought permission to set up as an independent consultant, to undertake work involving public speaking engagements as well as advising and delivering projects to assist organisations to improve their workplace culture and practices in order to unlock potential, especially from women and under-represented groups.

The Committee saw no reason why she should not establish this consultancy, subject to the following conditions:

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

The Committee wrote its advice letter to Ms Swinson in August 2015 and the first of her commissions was announced in October 2015.

Since establishing the consultancy, the following commissions have been announced:

- [Women of the World Festival Advisory Committee \(October 2015\)](#)
- [Everywoman \(November 2015\)](#)
- [The Parliament Project \(November 2015\)](#)
- [Northern Power Women Awards \(November 2015\)](#)
- [Chartwell Speaking Agency](#)
- [DBA Speakers](#)
- [CMI Women in Leadership \(February 2016\)](#)
- [CIPD \(March 2016\)](#)

Lord German recused himself from these cases.

2. Advisory Committee, Advertising Standards Agency

Ms Swinson sought the Committee's advice about taking up a part-time, paid appointment with the ASA sitting on the Advertising Advisory Committee overseeing the Broadcast Code of Practice.

When considering this application, the Committee took into account that Ms Swinson had occasional contact with ASA as a stakeholder through BIS, when carrying out work on payday lending, and at the Government Equalities Office, where she worked on body image and the portrayal of women in advertising. However, they also took into account that her former Departments, BIS and GEO, have no propriety concerns with this application, and that the role will not involve any lobbying of Government.

The Committee advised Ms Swinson that it saw no reason why she should not take up this appointment, subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her in her time as a Minister; and

- for two years from her last day in ministerial office, she should not become personally involved in lobbying the UK Government on behalf of ASA, its partners or its clients.

The Committee wrote its [advice letter](#) to Ms Swinson in October 2015 and she took up the appointment in January 2016.

Lord German recused himself from this case.

3. Panel Member, Research Board, BISL

Jo Swinson sought the Committee's advice about taking up a paid, part-time appointment with BISL Ltd, which operates under the trading name of Comparethemarket.com, as a Panel Member on the board of a research institute.

When considering this application, the Committee took into account that she did not have any official dealings with Comparethemarket.com while in ministerial office. They also noted that she had some involvement in the midata project, and attended related meetings about encouraging consumer switching. However, these were in the normal course of her ministerial duties and her former Department did not have any concerns regarding the propriety of this appointment.

The Committee advised Ms Swinson that it saw no reason why she should not take up this appointment, subject to the following conditions:

- She should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her in her time as a Minister; and
- For two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of BISL Ltd (Comparethemarket.com), its parent company or any of its subsidiaries, customers and clients.

The Committee wrote its [advice letter](#) to Ms Swinson in October 2015, and she took up the appointment in November 2015.

Lord German recused himself from this case.

4. Chair, Maternity Action

Jo Swinson sought the Committee's advice about taking up an unpaid, part-time appointment as Chair of the charity Maternity Action.

When considering this application, the Committee took into account she had some dealings with Maternity Action in her time as a Minister and that Maternity Action maintains an active relationship with her former Departments. However, her former Departments stated that they had no

propriety concerns with this appointment, and the Committee noted that it was an unpaid position.

The Committee advised Ms Swinson that it saw no reason why she should not take up this appointment, subject to the following conditions:

- she should not draw on privileged information available to her from her time in Government; and
- for two years from her last day in ministerial office, she should not become personally involved in lobbying the UK Government on behalf of Maternity Action.

The Committee wrote its [advice letter](#) to Ms Swinson in August 2015, and she took up the appointment in October 2015.

Lord German recused himself from this case.

5. Non-Executive Director, Clear Returns

Ms Swinson sought permission to accept a part-time appointment as a Non-Executive Director at Clear Returns.

When considering this application, the Committee took into account that Ms Swinson had no previous dealings with Clear Returns. The Committee did note that there is a link between IBM and Clear Returns and that, as a Minister, she had a relationship management role with IBM. The Committee further noted that Innovate UK, a BIS sponsored Non-Departmental Public Body, awarded Clear Returns a grant, but that this decision was made independently of Ministers. They also took into account that her former Departments have no propriety concerns regarding this appointment.

The Committee advised Ms Swinson that it saw no reason why she should not take up this appointment, subject to the following conditions:

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

The Committee wrote its [advice letter](#) to Ms Swinson in September 2015 and the appointment was announced that month.

Lord German recused himself from this case.

Baroness Warsi

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

1. Pro Vice Chancellor, Bolton University

Baroness Warsi sought the Committee's advice about taking up a paid, part-time appointment as Pro Vice Chancellor for the University of Bolton.

When considering this application, the Committee took into account that she had no interaction with the University or its competitors in her time as a Minister. They also noted that her former Departments had no propriety concerns with this appointment.

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

- She should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her as a Minister; and
- For two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of the University of Bolton, its students, staff or alumni.

The Committee wrote its [advice letter](#) to Baroness Warsi in November 2015, and she took up the appointment in January 2016.

2. Speaker, Specialist Speakers

Baroness Warsi sought advice about joining Specialist Speakers, a speaking agency.

When considering this application the Committee noted that Baroness Warsi did not have any official dealings with Specialist Speakers while in ministerial office, and is unaware of any relationship between the organisation and her former Departments.

The Committee advised Baroness Warsi that it saw no reason why she should not accept this appointment, subject to the following conditions:

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

The Committee wrote its [advice letter](#) to Baroness Warsi in May 2015.

3. Adviser, Rupert's Recipes Ltd

Baroness Warsi sought advice about taking up a role as an adviser for Rupert's Recipes Ltd, a family business in which she is a majority shareholder.

The Committee took into account that Baroness Warsi had no official dealings with Rupert's Recipes whilst in ministerial office.

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

- she should not draw on privileged information available to her from her time in Government; and
- for two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of Rupert's Recipes Ltd, its suppliers or customers.

The Committee wrote its [advice letter](#) to Baroness Warsi in May 2015.

Rt Hon Steve Webb

Steve Webb left his role as Minister for Pensions in May 2015.

1. Director of Policy, Royal London Group

Mr Webb asked for the Committee's advice about accepting a full time paid appointment as Director of Policy and Communications for Royal London Group, having left Government in May 2015.

The Committee took into account that during his time as Minister Mr Webb met regularly with pension companies including Royal London, although he stated that this was only 'on occasion'. Mr Webb stated that DWP had no special relationship with Royal London. DWP has confirmed that Mr Webb met with Royal London on two separate occasions as Minister. He may also have met officials from the company at various conferences.

The Committee noted that Mr Webb also met with competitors of Royal London. However, any commercially sensitive information was generally presented by DWP officials in an aggregated or anonymised form.

Although Royal London will have engagement with government in the course of its business, Mr Webb has informed us that it will not be part of his role with the organisation to be involved in such engagement. However, given how closely his ministerial responsibilities were related to Royal London's business, the Committee believes that a waiting period would be appropriate.

The Committee noted with concern that unofficial reports about Mr Webb's role with Royal London had appeared in the press before its advice could be given. However, the Committee did not believe that Mr Webb or his new employer were at fault for this and, taking into account all the circumstances, the Committee advised Mr Webb that it saw no reason why he should not accept this appointment subject to the conditions:

- that he should not draw on any privileged information available to him as a Minister;
- that there should be a six month waiting period from his last day in ministerial office; 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, its subsidiaries or its clients.

Lord German recused himself from this case.

The Committee wrote its [advice letter](#) to Mr Webb in August 2015 and the appointment was announced later that month (to be taken up in November 2015).

Rt Hon Lord Willetts

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

1. Non Executive Director, Biotech Growth Trust

Lord Willetts sought the Committee's advice about a part-time, paid, appointment with Biotech Growth Trust, a venture capital fund investing in life science businesses.

When considering this application, the Committee took into account that, as Minister for Science, part of Lord Willetts's responsibilities would have included life sciences, which is the area that Biotech invests in. However, they also noted that Lord Willetts had no official dealings with Biotech during his last two years in office, that there is no relationship between his former Department and Biotech, and that a gap of over a year had already occurred since he left ministerial office.

The Committee also noted that BIS saw no propriety concerns with this appointment.

The Committee advised Lord Willetts that it could see no reason why he should not take up this appointment, subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) any privileged information available to him from his time 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 Biotech Growth Trust PLC, OrbiMed Capital LLC, their subsidiaries, partners or clients.

The Committee wrote its [advice letter](#) to Lord Willetts in October 2015 and the appointment was taken up in November 2015.

2. Honorary President, International Student Foundation

Lord Willetts sought the Committee's advice about taking up an unpaid, part-time appointment as Honorary President of the International Student Foundation (ISF), advising and encouraging students in China to come to the UK, and helping to promote schemes for British students going abroad.

When considering this application, the Committee took into account that Lord Willetts had no dealings with ISF while in ministerial office, although there is a link between their work and his former responsibilities. However, the Committee noted that Lord Willetts left ministerial office nearly 18 months ago, and that the new position is unpaid. They further noted that Lord Willetts's former Department had no concerns regarding the propriety of the appointment.

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

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him in his time 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 the International Student Foundation, its partners, or any of its clients.

The Committee wrote its [advice letter](#) to Lord Willetts in December 2015 and he took up the role in January 2016.

3. Independent Trustee Director, Francis Crick Institute

Lord Willetts sought the Committee's advice about taking up an unpaid, part-time appointment as an Independent Trustee Director with the Francis Crick Institute.

When considering this application, the Committee took into account that he had direct dealings with the FCI in his time as a Minister and that the Institute did, and indeed still does, have a relationship with BIS. However, they also noted that he left his role as a Minister over a year ago, his dealings with FCI were some time before that, and that this position will be unpaid. His former Department had no propriety concerns with this appointment.

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

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him in his time 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 the

Francis Crick Institute, its consortium members, or any of its clients.

The Committee wrote its [advice letter](#) to Lord Willetts in October 2015, and he took up the appointment in December 2015.

4. Non-Executive Board Member, National Council for Universities and Business (NCUB)

Lord Willetts sought advice about accepting a part time position as a Non-Executive Board Member for NCUB.

When considering this application the Committee took into account that NCUB is affected by Government policy and is asked for advice by Government on promoting university/ business links. They also noted the views of his former Department.

Taking into account all of the circumstances, the Committee 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;
- 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, their parent company or clients.

The Committee wrote its [advice letter](#) to Lord Willetts in June 2015 and he took up the role that month.

5. Senior Non-Executive Director, Surrey Satellite Technologies Ltd (SSTL)

Lord Willetts sought advice about accepting a part-time, paid role with SSTL as a Senior Non-Executive Director.

When considering this application, the Committee noted that Lord Willetts did have official dealings with SSTL during his last two years in office in his capacity as Minister for Space, as they received funding from BIS via the UK Space Agency for satellite development. They also participate in an EU programme for Earth observation satellites and Galileo. The Committee further took into account that there is a relationship between SSTL and BIS as they sit on the Space Leadership Council, which he used to chair. The Committee also took into account that he did not have official dealings with potential competitors of SSTL.

Taking into account all the circumstances, the Committee was content to approve the appointment subject to the following conditions:

- that he should not draw on any privileged information available to him as a Minister;

- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of his new employer, their parent company or clients. This lobbying ban covers SSTL but it does not preclude contact with UK Trade & Investment (UKTI) on operational trade missions overseas in relation to the SSTL appointment;
- there should be a waiting period of 12 months from his last day in Ministerial office in relation to the SSTL appointment and the appointment may not be taken up until 1 August 2015.

The Committee wrote its [advice letter](#) to Lord Willetts in June 2015 and the appointment was taken up in September 2015.

Annex D – The Committee’s advice to former Crown servants

The Committee publishes its advice on all appointments it has considered, on an on-going basis, as and when they are either taken up or announced.

This annex contains summaries of that advice provided by the Committee during the reporting period.

Tera Allas

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

1. Senior Fellow, McKinsey Global Institute (MGI)

Mrs Allas sought advice on accepting a role as a Senior Fellow with MGI, a non-profit think tank, fully funded by the partners of McKinsey & Company Inc. Her responsibilities would be to identify economic issues of global importance to governmental and business decision makers. The Committee noted that Ms Allas formerly worked at McKinsey.

The Committee noted that the role was likely to involve contact with Government, as MGI frequently presents its findings to Governments, including in the UK. However, Mrs Allas stated that MGI does not lobby on anyone’s behalf, it simply outlines its analysis and findings and does not charge for any of its work.

The Prime Minister accepted the Committee’s advice that there was no reason why she should not take up the appointment, subject to the conditions that:

- 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, Mrs Allas should not become personally involved in lobbying the UK Government, Ministers or Crown servants, including Special Advisers, on behalf of her new employer, its parent companies or its clients; and
- as this approval relates only to this appointment with MGI, Mrs Allas should make a further, separate application to the Committee should she propose to undertake any work with McKinsey & Company, whether paid or unpaid.

The [letter](#) containing the final advice was sent in June 2015 and the appointment was taken up in July 2015.

2. Commissions under independent consultancy

Tera Allas set up as an [independent consultant](#) in April 2014. Since setting up as an independent consultant, she has asked for the Committee's advice on accepting a number of commissions (the details are published on the website and in the 2014-15 Annual Report).

During the 2015-16 reporting year, Mrs Allas sought the Committee's advice in relation to an appointment with [Vivid Economics](#).

The Committee agreed that the commission falls under the terms of her independent consultancy and could be accepted, subject to the conditions imposed on the consultancy.

Michael Anderson

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

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

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

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

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

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

Nick Baird

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

1. Member of the Board of Trustees, Royal Botanic Gardens, Kew

Mr Baird sought advice on a part time appointment as a Member of the Board of Trustees, Royal Botanic Gardens, Kew.

The Foreign Secretary accepted the Committee's advice that there was no reason why he should not take up this appointment, subject to the following conditions:

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

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

2. Non Executive Director, Nord Anglia Education (Hong Kong)

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

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

The Foreign Secretary accepted the Committee's recommendation that there was no reason why he should not take up the appointment, subject to the following conditions:

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

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

Keith Bristow

Keith Bristow left his role as Director General, National Crime Agency in January 2016.

1. Independent Consultancy

Keith Bristow sought the Committee's advice about setting up an independent consultancy offering a range of advisory and consultancy services. The areas the consultancy would cover include: leadership and management development; risk and reputation management; governance and standards;

and law enforcement, security and policing. Under this consultancy, Mr Bristow wished to take up commissions as a Senior Adviser to INTERPOL and with Arcanum Global.

When considering this application, the Committee considered the relationship between the NCA and INTERPOL and were reassured by the views of the NCA and Home Office who had no concerns with him taking up work with INTERPOL.

The Prime Minister accepted the Committee's recommendation that there was no reason why Mr Bristow should not set up this consultancy, and take up the two commissions, subject to the following conditions:

- He should not draw on any privileged information available to him from his time in Crown service;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of any of his clients or those he advises. This is not meant to restrict the standard contact that may occur between NCA and INTERPOL officials.
- For 12 months from his last day of service he should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the NCA; and
- Once he has received approval to set up as an independent consultant, he must seek confirmation from the Committee directly that each subsequent individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application.

The [letter](#) containing the final decision was sent in December 2015 and the appointment was announced in January 2016.

Baroness Browning recused herself from this case.

Under this consultancy, Mr Bristow has since accepted further commissions as:

- [Chair, Gambling Anti-Money Laundering Group](#)
- [Non Executive Chair, Arquebus Solutions Ltd](#)
- [Adviser to the Commissioner, Australian Federal Police](#)

Peter Carroll

Peter Carroll left his role as a Special Adviser in HM Treasury in April 2015.

1. Tendo Consulting company, and commission with Road Haulage Association

Peter Carroll sought advice on establishing a consultancy service, Tendo, providing general consultancy on how to communicate with government and how to deliver public affairs and public engagement strategies. He also sought permission to accept a commission with the Road Haulage Association. This company would be set up jointly with William de Peyer, a fellow former Special Adviser.

The Committee took into account that Mr Carroll intends to provide general consultancy advice, but that he does not intend to lobby government or civil servants directly. He has had no access to commercially sensitive information about competitors that would be of use to his new clients. The Committee also noted that HM Treasury did not consider that there were any conflicts of interest or commercially sensitive issues to consider.

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

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

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

2. Commissions with TSB Bank Plc, Tax Incentivised Savings Association, McBee Strategic and National Defence Medal Campaign

Mr Carroll sought advice on accepting four commissions under the terms of his independent consultancy that was approved by the Committee in July 2015.

In October 2015 Mr Carroll sought advice on taking up commissions with TSB Bank Plc (TSB) and Tax Incentivised Savings Association (TISA).

In January 2016 he sought advice on taking up commissions with McBee Strategic and National Defence Medal Campaign.

The commission with TSB is to assist in the writing and production of a report into the benefits of competition across several markets in the UK and the TISA commission involves providing a three-hour training course on how it can best make representations to government. The commission with McBee

Strategic is to act in a media consultancy capacity to help them gain public awareness and coverage for their clients. He will also be acting as a campaign consultant to the National Defence Medal Campaign.

Mr Carroll sought advice jointly with Will de Peyer, a fellow former Special Adviser.

The Committee agreed that these commissions were permissible within the terms of Mr Carroll's original consultancy, and should be subject to the conditions imposed on that consultancy.

The [letter](#) containing the Committee's advice in relation to TSB Bank Plc and Tax Incentivised Savings Association was sent in October 2015 and the [letter](#) in relation to the remaining commissions was sent in January 2016. The commissions were taken up in January 2016.

3. Commission running a campaign on drugs reform

Mr Carroll sought advice on running a campaign on drugs reform through his consultancy company, Tendo Consulting, with funding from organisations with an interest in the subject.

The Committee noted his assurance that the campaign will not involve any direct lobbying of Government and will be directed towards raising public awareness of the issues.

Mr Carroll sought advice jointly with Will de Peyer, a fellow former Special Adviser.

The Committee noted that this commission went further than the original terms of the consultancy, which was defined as providing 'general consultancy on how to communicate with Government and how to deliver public affairs and public engagement strategies'. However, in view of the fact that Mr Carroll had no involvement in relevant policy areas while in Government, and his assurance about not lobbying Government, the Committee was prepared to approve the commission subject to the conditions imposed on the original consultancy.

The [letter](#) containing the Committee's advice was sent in February 2016.

Graham Dalton

Graham Dalton left his role as Chief Executive of the Highways Agency in June 2015.

1. Specialist Advisor, World Bank

Mr Dalton sought the Committee's advice on a part-time, paid appointment with the World Bank as a Specialist Advisor.

The Prime Minister accepted the Committee's recommendation that there was no reason why he should not take up this appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) any privileged information available to him from his time in Crown service; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the World Bank, or any of its partners or clients.

The [letter](#) containing the final advice was sent in November 2015 and the appointment was taken up that month.

Will de Peyer

Will de Peyer left his role as a Special Adviser in HM Treasury in April 2015.

1. Tendo Consulting company, and commission with the Road Haulage Association

William de Peyer sought advice on establishing a consultancy service, Tendo, providing general consultancy on how to communicate with government and how to deliver public affairs and public engagement strategies. He also sought permission to accept a commission with the Road Haulage Association. This would be set up jointly with Peter Carroll, a fellow former Special Adviser. The Committee took into account that Mr de Peyer intends to provide general consultancy advice, but that he does not intend to lobby government or civil servants directly. He has had no access to commercially sensitive information about competitors that would be of use to his new clients. The Committee also noted that HM Treasury did not consider that there were any conflicts of interest or commercially sensitive issues to consider.

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

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

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

2. Commissions with TSB Bank Plc, Tax Incentivised Savings Association, McBee Strategic and National Defence Medal Campaign

Mr de Peyer sought advice on accepting four commissions under the terms of his independent consultancy that was approved by the Committee in July 2015.

In October 2015 Mr de Peyer sought advice on taking up commissions with TSB Bank Plc (TSB) and Tax Incentivised Savings Association (TISA).

In January 2016 he sought advice on taking up commissions with McBee Strategic, and the National Defence Medal Campaign.

The commission with TSB is to assist in the writing and production of a report into the benefits of competition across several markets in the UK and the TISA commission involves providing a three-hour training course on how it can best make representations to government. The commission with McBee Strategic is to act in a media consultancy capacity to help them gain public awareness and coverage for their clients. He will also be acting as a campaign consultant to the National Defence Medal Campaign.

Mr de Peyer sought advice jointly with Peter Carroll, a fellow former Special Adviser.

The Committee agreed that these commissions were permissible within the terms of Mr de Peyer's original consultancy, and should be subject to the conditions imposed on that consultancy.

The [letter](#) containing the Committee's advice in relation to TSB Bank Plc and Tax Incentivised Savings Association was sent in October 2015 and the [letter](#) in relation to the remaining commissions was sent in January 2016. The commissions were taken up in January 2016.

3. Commission running a campaign on drugs reform

Mr de Peyer sought advice on running a campaign on drugs reform through his consultancy company, Tendo Consulting, with funding from organisations with an interest in the subject.

The Committee noted his assurance that the campaign will not involve any direct lobbying of Government and will be directed towards raising public awareness of the issues.

Mr de Peyer sought advice jointly with Peter Carroll, a fellow former Special Adviser.

The Committee noted that this commission went further than the original terms of the consultancy, which was defined as providing ‘general consultancy on how to communicate with Government and how to deliver public affairs and public engagement strategies’. However, in view of the fact that Mr Carroll had no involvement in relevant policy areas while in Government, and his assurance about not lobbying Government, the Committee was prepared to approve the commission subject to the conditions imposed on the original consultancy.

The [letter](#) containing the Committee’s advice was sent in February 2016.

Richard Douglas

Mr Douglas left his role as Director General, Finance and NHS, Department of Health, in May 2015.

1. Adviser, Government Faculty, Chartered Institute of Public Finance and Accountancy (CIPFA)

Mr Douglas sought advice on an appointment as an Adviser to the Government Faculty of CIPFA.

The Committee noted that, given Mr Douglas’s background as a finance professional, while in post he met with all the major accountancy institutes roughly once a quarter. However, they also took into account the views of Mr Douglas’s former Department, which had no concerns and did not believe CIPFA could gain any unfair advantage through the appointment, especially given that relevant thinking in the Department and wider Government Finance Profession is routinely shared with and shaped by all accountancy bodies. Furthermore, they noted that Mr Douglas left office nearly a year ago, and so his knowledge from the Department is a year out of date.

The Prime Minister accepted the Committee’s advice that there was no reason why Mr Douglas should not accept this position, subject to the following conditions:

- For two years from his last day of service, he should not become personally involved in lobbying the UK Government on behalf of CIPFA, its partners or members; and
- He should not draw on (disclose or use for the benefit of himself or the organisations to which this advice refers) privileged information available to him from his time in Crown service.

The [letter](#) containing the final advice was sent to March 2016 and the appointment was taken up later that month.

2. Senior Counsel, Incisive Health

Mr Douglas sought advice on an appointment as Senior Counsel with Incisive Health, a health policy consultancy.

The Committee noted that the role will involve providing advice on internal governance and strategic direction, advising on public affairs strategies for clients, and supporting professional development. They also took into account Mr Douglas's statement that the role will not involve direct dealings with either clients of Incisive Health or civil servants, and that he will not have contact with his former Department or government more generally.

The Committee took into account the views of the Department of Health, which had no concerns about the appointment and felt that the gap since his last day in service meant he had not had access to information that could give his new employer an unfair advantage.

The Prime Minister accepted the Committee's advice that there was no reason why Mr Douglas should not accept this position, subject to the following conditions:

- For two years from his last day of service, he should not become personally involved in lobbying the UK Government on behalf of Incisive Health or its clients; and
- He should not draw on privileged information available to him from his time in Crown service.

The [letter](#) containing the final advice was sent in February 2016 and the appointment was announced later that month.

Oliver Dowden MP

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

1. Political Advisor, Association of Independent Professionals and the Self Employed

Oliver Dowden sought advice on accepting a role as a Political Advisor with the Association of Independent Professionals and the Self Employed (IPSE). IPSE is a not-for-profit organisation representing self-employed contractors and freelancers.

The Committee noted that, although IPSE's work does involve lobbying government, Mr Dowden was clear that his role would not involve contact with his former Department or central government, lobbying, or parliamentary representation. The Committee further noted that Mr Dowden did not have any direct contractual dealings with IPSE over his last two years of service and was not responsible for anyone who did. They also took into account that he was also not involved in the development or administration of any Departmental policy, which would have affected the organisation or its competitors.

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

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

Baroness Browning recused herself from this case.

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

2. Policy Advisor, Caxton Europe Asset Management

Oliver Dowden sought advice on accepting a role as a Policy Advisor with Caxton Europe Asset Management, a subsidiary of Caxton Associates LP. The organisation is a trading and investment firm. Mr Dowden will act as a Policy Advisor, providing advice and analysis about UK and international policy and developments.

The Committee noted Mr Dowden's statement that the proposed contract makes clear that Caxton Europe Asset Management is not retaining him as a Policy Adviser for the purpose or intent of affecting or influencing current or proposed legislation, any Government action, or any Government official. The Committee also took into account that Mr Dowden was not involved in the development or administration of any Departmental policy, or the awarding of any grants, which would have affected the organisation or its competitors.

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

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

Baroness Browning recused herself from this case.

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

Sir Simon Fraser

Sir Simon Fraser left his role as Permanent Under Secretary in the Foreign & Commonwealth Office in July 2015.

1. Founding Partner, Flint Global Ltd

Sir Simon sought advice on establishing a new company advising businesses and third sector organisations on international and European business issues with a particular focus on regulation, competition and international issues. When considering this application, the Committee noted Sir Simon's statement that the company had no intention to carry out lobbying or to represent clients in their relations with Government. The Committee took into account that Sir Simon has had general dealings with a wide range of business leaders in his roles at the FCO and previously at BIS. However, these have been at a general policy and strategic level, and he has had no access to commercially sensitive information relevant to any potential clients under consideration.

The Committee further noted that, as a Permanent Secretary, Sir Simon is subject to an automatic three month waiting period before taking up any new appointment.

The Foreign Secretary accepted the Committee's advice that there was no reason why he should not establish this company, subject to the following conditions:

- A waiting period of three months from his last day in Crown service;
- for two years from his last day of service, he should not become personally involved in lobbying the UK Government on behalf of his new company or its clients;
- he should not draw on privileged information available to him from his time in Crown service;
- for 12 months from his last day of service he should not undertake any work which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the FCO; and
- for two years from his last day of service, he must seek confirmation from the Committee directly that each individual commission he undertakes or is involved in for his new company is permissible under the agreed terms before taking it up. If, after enquiry, the Committee takes the view that the work is, or may be, outside the terms previously agreed he will be expected to submit a fresh application.

The [letter](#) containing the final advice was sent in June 2015 and the company formally commenced work in November 2015.

Bernard Galton

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

1. Non Executive Director, Joint Venture between local authorities and Capita

Mr Galton asked for the Committee's advice retrospectively about taking up a part-time, paid appointment as a non-executive director in a company set up to pursue a joint venture (JV) between three Welsh local authorities and Capita Property and Infrastructure.

The Committee noted with concern that Mr Galton's application had been submitted some time after he had accepted and taken up the appointment. Although unwilling to give retrospective approval for the appointment, the Committee was willing to provide the Welsh Government with a view on this occasion due to the extenuating circumstances in this case.

Mr Galton's role is to develop the JV Board and to bring his personal experience of operating at Board level to improve the way the Board and its governance operates. The Committee noted his assurance that he does not have, and has not had, responsibility for lobbying Government, and that he will not become involved in any procurement activity that Capita P&I may engage in with either the public or private sectors.

Additionally, both he and the Welsh Government confirmed that he did not have any direct contractual dealings with Capita P&I (nor did he have official dealings with competitors) during his last two years of service nor was he responsible for people who had.

Had the appointment not been taken up before the Committee could offer its advice, it would have advised that it saw no reason why he should not take up the appointment subject to the restrictions in the rules on drawing on privileged information and lobbying Government. The Committee noted Mr Galton's assurances that he has honoured these conditions to date and will continue to do so.

The [letter](#) containing the Committee's views was sent in February 2016.

Stephen Gooding

Stephen Gooding left his role as a Director General in the Department for Transport in April 2015.

1. Director, RAC Foundation

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

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

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

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

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

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

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

Gareth Hall

Gareth Hall left his role with the Welsh Government in September 2015.

1. Independent Consultancy and commission with Isle of Anglesey Council

Gareth Hall sought advice on establishing an independent consultancy advising and supporting major developers and local authorities on approaches to planning matters relating to complex major energy infrastructure projects. The Committee noted that as an independent consultant Mr Hall would like to accept a commission with the Isle of Anglesey County Council, where he had been on secondment since January 2011.

The Committee took into account the views of the Welsh Government and their recommendation that, in all the circumstances, a three month time restriction with regard to this commission would be appropriate.

The First Minister accepted the Committee's advice that there was no reason why Mr Hall should not establish his consultancy and undertake a commission with the Isle of Anglesey County Council, subject to the following conditions:

- A waiting period of three months from his last day of service before he takes up the commission with the Isle of Anglesey County Council;
- For two years from his last day of service, he should not become personally involved in lobbying the Welsh Government on behalf of any of his clients or those he advises;

- He should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) privileged information available to him from his time in Crown service;
- For 12 months from his last day of service he should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the Welsh Government; and
- For two years from his last day of service, before accepting any new commission he should make a case directly to the Committee to confirm that each individual commission he wishes to undertake would be permissible under the approved terms of the consultancy. (If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application).

The Committee provided its [advice](#) in December 2015 and Mr Hall took up his commission in January 2016.

Peter Handcock

Peter Handcock left his role as Chief Executive of HM Courts & Tribunals Service in December 2014.

1. Trustee and Board Member, Personal Support Unit

Peter Handcock sought advice on accepting a part-time, unpaid appointment as a Trustee and Board Member of the Personal Support Unit (PSU), a charity that provides support to those using civil and family courts without legal representation.

When considering this application the Committee noted that this was an unpaid appointment and that the MOJ raised no concerns about Mr Handcock taking up the role.

The Prime Minister accepted the Committee's advice that there was no reason why Mr Handcock should not take up this appointment, subject to the following conditions:

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

The [letter](#) containing the final advice was sent in June 2015 and the appointment was taken up later that month.

Rupert Harrison

Rupert Harrison left his role as Special Adviser in HM Treasury in March 2015.

1. Managing Director, Dynamic Diversified Growth team, Blackrock

Mr Harrison sought advice on accepting a role as Managing Director in the Dynamic Diversified Growth team at Blackrock. Blackrock is a multinational investment management corporation based in America.

The Committee took into account that Mr Harrison has been involved in the development of the Government's approach to regulation of the banking sector. However, this work was focussed on the nature of the structure of the financial sector in general and did not specifically relate to asset management. The Committee noted that he has not had access to commercially sensitive information about any competitors of Blackrock.

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

- he should not draw on privileged information available to him as a Crown servant;
- 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 company or its clients.

Baroness Browning recused herself from this case.

The [letter](#) containing the final advice was sent in June 2015 and the appointment was announced later that month.

2. Trustee, Tavistock Centre for Couple Relationships

Mr Harrison sought the Committee's advice about taking up a trustee position with the Tavistock Centre for Couple Relationships (TCCR), a charity that undertakes training, counselling, psychotherapy and research.

In considering the application the Committee noted that this is an unpaid role and is not likely to include any contact or dealings with government.

The Committee took into account that Mr Harrison had no official dealings with TCCR in his last two years of service. Furthermore, the Committee noted that while TCCR receives funding from government, this does not come from HM Treasury directly.

The Committee advised Mr Harrison that it could see no reason why he should not take up this appointment, subject to the following conditions:

- For two years from his last day of service, he should not become personally involved in lobbying the UK Government on behalf of Tavistock Centre for Couple Relationships or its parent organisation, Tavistock Institute of Medical Psychology; and
- He should not draw on privileged information available to him from his time in Crown service.

Baroness Browning recused herself from this case.

The [letter](#) containing the Committee's advice was sent in February 2016 and the appointment was taken up the following month.

Bronwyn Hill

Bronwyn Hill left her job as Permanent Secretary, Department for Environment, Food and Rural Affairs, in July 2015.

1. Non-Executive Board Member, Office for Nuclear Regulation

Ms Hill sought advice on a part-time, paid appointment with the Office for Nuclear Regulation (ONR).

When considering this application, the Committee took into account that Ms Hill had had no official dealings with ONR and that her former Department had no propriety concerns regarding this appointment.

The Prime Minister accepted the Committee's advice that there was no reason why Ms Hill should not take up this appointment, subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) any privileged information available to her from her time as a Crown Servant; and
- for two years from her last day in Crown Service, she should not become personally involved in lobbying the UK Government on behalf of ONR.

The [letter](#) containing the final advice was sent in January 2016 and the appointment was announced later that month.

Sir Peter Housden

Sir Peter Housden left his role as Permanent Secretary, Scottish Government, in June 2015.

1. Independent Consultancy

Sir Peter sought advice on establishing an independent consultancy to provide professional services in devolution, service integration, leadership and

workforce development to governments, regional and local authorities, and voluntary organisations. Under this consultancy he initially wished to take up commissions with Deloitte and the Centre for Effective Services.

When considering this application the Committee noted the views of the Countersigning Officer and the Scottish Government, which had no concerns with him undertaking this work.

The First Minister accepted the Committee's recommendation that there was no reason why Sir Peter should not establish this consultancy, subject to the conditions that:

- for two years from his last day of service, he should not become personally involved in lobbying the Scottish Government on behalf of any of his clients or those he advises;
- he should not draw on (disclose or use for the benefit of himself or the organisation to which he is contracted) privileged information available to him from his time in Crown service;
- for 12 months from his last day of service he should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the Scottish Government; and
- for two years from his last day of service, before accepting any new commission he should make a case directly to the Committee to confirm that each individual commission he wishes to undertake would be permissible under the approved terms of the consultancy, including any from Deloitte. (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).

In addition in this case, given Sir Peter's previous senior roles in the UK Government and the level of his continuing interaction with the UK Government while at the Scottish Government, the Committee considers he should not front-up or take part in the initial stage of any negotiations or tendering process with the UK Government with a view to influencing a government decision with regard to the design or award of a contract.

The Committee provided its [advice](#) on this application in December 2015.

Under his consultancy, Sir Peter has since taken up commissions with:

- [Centre for Effective Services \(December 2015\)](#)
- [Deloitte - in connection with their Transformational Leadership Programme for Hampshire County Council \(December 2015\)](#)
- [RCN \(March 2016\)](#)
- [Centre for Public Impact \(May 2016\)](#)

Sir Tom Jeffrey

Sir Tom Jeffery left his role as Director General in the Department for Education in December 2014.

1. Board Member, National Development Team for Inclusion (NDTI)

Sir Tom sought the Committee's advice about a part-time, unpaid role with NDTI, an organisation that works in the fields of disability, mental health, ageing and children's services.

When considering this application, the Committee noted that Sir Tom had been responsible for people who had contractual dealings with NDTI while in office. However, after seeking views from the Department for Education, the Committee took into account that, although the responsibility lay with his directorate, Sir Tom had played no part in the awarding of these contracts. They further noted the fact that his new role was unpaid.

The Prime Minister accepted the Committee's recommendation that there was no reason why he should not take up this appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) any privileged information available to him from his time in Crown Service; and
- For two years from his last day in Crown Service, he should not become personally involved in lobbying the UK Government on behalf of NDTI, their partners, subsidiaries, or clients.

The [letter](#) containing the final advice was sent in October 2015 and the appointment was taken up in December 2015.

Gareth Jones

Gareth Jones left his role as Director General, Welsh Government, in September 2015.

1. Strategic Adviser, Enterprise Registry Solutions

Gareth Jones sought advice on accepting a position as a Strategic Adviser for Enterprise Registry Solutions (ERS), an IT development and maintenance company specialising in registry services.

When considering this application the Committee noted that Mr Jones had no dealings with ERS in his last post, although he had some limited contact with them during his time as Registrar and Chief Executive of Companies House, a position he held from 2007-2012. However, that contact had been limited to broad strategic discussions and, as the UK registry is developed and maintained in-house, Mr Jones had never been involved in awarding

contracts/grants in the field. The Committee noted that all of Mr Jones's dealings with the registry sector had taken place nearly four years ago. The Committee took into account the views of the Welsh Government and BIS, Mr Jones's former Department, neither of which raised any concerns about this appointment. However, given Mr Jones's prior roles, the Committee believed that a lobbying ban covering both the Welsh and UK Government was appropriate.

The First Minister accepted the Committee's advice that there was no reason why Mr Jones should not take up this role, subject to the following conditions:

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

The Committee provided its [advice](#) on this application in February 2016 and Mr Jones took up the role in March 2016.

Lord Kerslake

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

1. Chair, Sheffield Theatres Trust

Lord Kerslake sought advice on accepting a voluntary role with the Sheffield Theatres Trust.

When considering this application, the Committee noted that Lord Kerslake did not have any direct contractual dealings with the Sheffield Theatres Trust in his last two years of service and was not responsible for any members of staff who did.

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

- Lord Kerslake should not draw on (disclose or use for the benefit of himself, or the organisation, or person to which this advice refers) privileged information available to him from his time in Crown service; and
- for two years from his last day of service, Lord Kerslake should not become personally involved in lobbying the UK Government on behalf of the Sheffield Theatres Trust, its partners or their clients.

The [letter](#) containing the final decision was sent in October 2015 and the appointment was announced later that month.

2. Chair of the Board, London Pension Collective Investment Vehicle

Lord Kerslake sought advice on accepting a part-time, paid role as Chair of the Board with the London Pension Collective Investment Vehicle (London CIV), part of London Councils. London CIV is a new body through which London Boroughs will be able to invest their pension funds to achieve economies of scale, cost savings and opportunities to invest in new asset classes.

When reaching a decision, the Committee noted that DCLG is responsible for local government pension policy and, jointly with the Cabinet Office, has led the work on the creation of collective investment vehicles in local government. As Permanent Secretary, Lord Kerslake will have had some involvement in the development or administration of Departmental policy that affected the London CIV. However, the Committee noted that the creation of collective investment vehicles is Government policy, of which the London CIV is an early example, and that Lord Kerslake was not involved in awarding any grants to the London CIV. The Committee also noted Lord Kerslake's long career in local government, which predates his time at DCLG. Therefore, the Committee does not believe that the appointment could reasonably be perceived as a reward for decisions taken by Lord Kerslake or his former Department during his time in Crown service.

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

- Lord Kerslake should not draw on [disclose or use for the benefit of himself, or the organisation, or person to which this advice refers] any privileged information available to him from his time in Government.
- For two years from his last day of service, Lord Kerslake should not become personally involved in lobbying the UK Government on behalf of the London CIV, its constituent organisations, or clients.

The [letter](#) the final advice was sent in September 2015, and he took up the appointment later that month.

3. Independent Consultancy

Lord Kerslake sought advice on setting up an independent consultancy company called Endcliffe Services. The company would provide management services on a consultancy basis.

The Committee noted that Lord Kerslake does not intend to provide advisory services related to central government and will instead focus on consultancy work connected to local government and the health sector.

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

- For 12 months from his last days of service Lord Kerslake 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 his former Departments.
- Lord Kerslake should not draw on privileged information available to him from his time in Crown service; and
- For two years from his last day of service, Lord Kerslake should not become personally involved in lobbying the UK Government on behalf of his new company, his clients or those he advises.
- Before accepting any commission Lord Kerslake should make a case directly to the Committee to confirm that each individual commission he wishes to undertake would be permissible under the approved terms of the consultancy. (If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application).

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

4. Retained Associate, Penna

Lord Kerslake sought advice about accepting a Commission with Penna, as part of his consultancy company Endcliffe Services. Penna is a global people management organisation, working in the HR Services industry. The Company offers a wide range of HR services, including recruitment, training and interim management. Penna is a UK based company and operates in both the private and public sector.

When considering these applications, the Committee noted that Lord Kerslake did not have official dealings with Penna during his last two years in office. Although DCLG had some contracts with Penna, Lord Kerslake had no involvement in the award of these, and the Department has no concerns with him accepting a role with Penna. Furthermore, the Committee took into account that Lord Kerslake was not involved in contracts awarded to recruitment consultants and he therefore did not have any direct dealings with any of Penna's competitors.

When reaching a decision the Committee has also noted Lord Kerslake's assurance that he will not be involved in recruitment or advisory work with central government.

The Prime Minister has accepted the Committee's recommendation that this application be approved, subject to the terms applied to Lord Kerslake's consultancy company.

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

Dr Vanessa Lawrence

Dr Vanessa Lawrence left her role as Head of Ordnance Survey International in December 2014.

1. Independent Consultant

Dr Lawrence sought advice on setting up as an independent consultant, to provide strategic advice on how to optimise information assets in the global digital arena.

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

- for two years from her last day of service, she should not become personally involved in lobbying the UK Government on behalf of any of her clients or those she advises;
- she should not draw on privileged information available to her from her time in Crown service;
- for 12 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 Ordnance Survey or any subsidiary of Ordnance Survey; 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 she 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).

The [letter](#) containing the final advice was sent in June 2015 and Dr Lawrence took up the first of her commissions in September 2015.

Under her independent consultancy she has accepted commissions with:

- [Satellite Applications Catapult \(September 2015\)](#)
- [National Geospatial Information Committee, Saudi Arabia \(September 2015\)](#)
- [World Bank Group \(October 2015\)](#)

Sir Iain Lobban

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

1. Independent Consultancy

Sir Iain sought permission to establish an independent consultancy, offering strategic advice on risk, primarily, but not exclusively, in the context of cyber

security, and set out how this relates to organisational and personal leadership.

The Foreign Secretary accepted the Committee's advice that, taking into account that a gap of three months has already occurred, this consultancy be approved subject to the conditions that:

- Sir Iain 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 on behalf of any of his clients or those he advises;
- for 12 months from his last day of service, Sir Iain 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 GCHQ; and
- once he has received approval to set up as an independent consultant, for two years from his last day of service he must seek confirmation from the Committee directly that each individual commission is permissible under the terms of his consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application.

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

Under his independent consultancy, Sir Iain has accepted commissions with:

- [Holdingham Group \(August 2015\)](#)
- [Palo Alto Networks \(September 2015\)](#)
- [Royal Dutch Shell \(September 2015\)](#)
- [Glasswall \(November 2015\)](#)
- [Marsh Ltd \(February 2016\)](#)
- [Global Strategy Forum \(February 2016\)](#)
- [Worldpay \(March 2016\)](#)
- [SQR Systems \(April 2016\)](#)
- [Wynyard Group \(April 2016\)](#)

2. Visiting Professor, King's College

Sir Iain sought the Committee's advice about taking up an unpaid appointment with King's College London as a visiting professor.

The Committee took into account that Sir Iain had no contractual dealings with King's while in post, 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 their competitors. The Committee also took into account Sir Iain's statement that he would consult his former Department in advance of any public work he wishes to undertake for King's College.

The Foreign Secretary accepted the Committee's recommendation that it sees no reason why Sir Iain should not take up this appointment, subject to the following conditions:

- Sir Iain 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 Iain should not become personally involved in lobbying the UK Government on behalf of the organisations in which he holds appointments, their parent companies, subsidiaries or clients.

The [letter](#) containing the final decision was sent in August 2015 and the appointment was taken up in September 2015.

3. Honorary Fellow of the Judge Business School, Cambridge University

Sir Iain sought the Committee's advice about taking up an unpaid appointment with Cambridge University as an Honorary Fellow of the Judge Business School.

The Committee took into account that Sir Iain had no contractual dealings with Cambridge University while in post and 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 their competitors. The Committee also took into account Sir Iain's statement that he would consult his former Department in advance of any public work he wishes to undertake for Cambridge University.

The Foreign Secretary has accepted the Committee's recommendation that it sees no reason why Sir Iain should not take up this appointment, subject to the following conditions:

- Sir Iain 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 Iain should not become personally involved in lobbying the UK Government on behalf of the organisations in which he holds appointments, their parent companies, subsidiaries or clients.

The [letter](#) containing the final decision was sent in August 2015 and the appointment was taken up in in September 2015.

4. Chairman of the Advisory Board, Cyber London Accelerator (CyLon)

Sir Iain sought permission to accept an unpaid role as Chairman of the Advisory Board for CyLon. The Committee took into account that Sir Iain had not had contractual dealings with his new employers while in post, 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 noted that, as Sir Iain left Crown service in January, the three-month waiting period for former Permanent Secretaries has already expired.

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

- 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, he should not become personally involved in lobbying the UK Government on behalf of the organisations in which he holds appointments, their parent companies or their clients.

The [letter](#) containing the final advice was sent in June 2015 and the appointment was announced in July 2015.

5. Member of the Board of Advisors, Cambridge Security Initiative

Sir Iain sought permission to accept an unpaid role as a member of the Board of Advisers to the Cambridge Security Initiative (CSI).

The Committee took into account that Sir Iain had not had contractual dealings with his new employers while in post, 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 Sir Iain's statement that he would consult his former Department in advance of any public work he undertakes for CSI, and will consult the FCO, through GCHQ, in respect of any such international work.

The Committee also noted that, as Sir Iain left Crown service in January, the three-month waiting period for former Permanent Secretaries has already expired.

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

- 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, he should not become personally involved in lobbying the UK Government on behalf of the organisations in which he holds appointments, their parent companies or their clients.

The [letter](#) containing the final advice was sent in June 2015 and the appointment was announced in July 2015.

6. Senior Associate Fellow, RUSI

Sir Iain sought permission to accept an unpaid role as a Senior Associate Fellow with the RUSI.

The Committee took into account that Sir Iain had not had contractual dealings with his new employers while in post, 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 Sir Iain's statement that he would consult his former Department in advance of any public work he undertakes for RUSI, and will consult the FCO, through GCHQ, in respect of any such international work.

The Committee also noted that, as Sir Iain left Crown service in January, the three-month waiting period for former Permanent Secretaries has already expired.

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

- 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, he should not become personally involved in lobbying the UK Government on behalf of the organisations in which he holds appointments, their parent companies or their clients.

The [letter](#) containing the final advice was sent in June 2015 and the appointment was announced in July 2015.

Stephen Lotinga

Stephen Lotinga left his role as Director of Communications in the Deputy Prime Minister's Office in March 2015.

1. Chief Executive, Publishers Association

Mr Lotinga sought the Committee's advice about a full time appointment as Chief Executive of the Publishers Association.

The Committee took into account that Mr Lotinga had no official dealings with the Publishers Association while in Crown service, and no involvement in policy that could have affected its work. They also noted that his former Department, Cabinet Office, had no concerns regarding the application.

The Permanent Secretary accepted the Committee's advice that there was no reason why Mr Lotinga should not take up this appointment, subject to the following conditions:

- Mr Lotinga should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) any privileged information available to him from his time in Crown Service;

- for two years from his last day in Crown Service, he should not become personally involved in lobbying the UK Government on any matter with which he was directly involved while in government (this is not intended to prevent communications with Government that are part of the normal course of business for the Publishers Association); and
- Mr Lotinga should avoid direct commercial contact with the Cabinet Office.

The Committee wrote its [advice letter](#) about this appointment in December 2015 and the appointment was taken up in January 2016.

2. Director of External Affairs and Strategy, Parliamentary and Health Service Ombudsman

Mr Lotinga sought the Committee's advice on taking up an appointment as Director of External Affairs and Strategy at the Parliamentary and Health Service Ombudsman (PHSO).

The Committee took into consideration that the PHSO is an independent complaints handling service set up by Parliament to help individuals and the public; that Mr Lotinga has had no previous dealings with the PHSO; and that his former Department have no concerns about the appointment, and suggested that the standard two-year lobbying ban be amended to allow him to liaise with the Government as part of his role.

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

- Mr Lotinga should not draw on [disclose, or use, for the benefit of himself or the PHSO] privileged information available to him from his time in Crown Service; and
- for two years from his last day of service, he should not generally become personally involved in lobbying the UK Government on behalf of the PHSO. However, in view of the nature of the PHSO's work, this restriction should not apply, in this case, to communications with Government on matters that are an integral part of the work of the PHSO in handling public service complaints; nor with regard to matters arising from the current consultation and any subsequent legislation leading to the creation of and transition to a new public service ombudsman.

The [letter](#) containing the Committee's advice was sent in September 2015 and the appointment was taken up that month.

Dame Mariot Leslie

Dame Mariot Leslie left her role as Permanent Representative at the UK Joint Delegation to NATO in April 2014.

1. Member of the Trade and Investment Strategy Partnership, Scottish Government.

Dame Leslie sought advice about accepting a part-time, unpaid role with the Scottish Government. In this role Dame Leslie would form part of the partnership providing advice from external stakeholders to the Scottish Government on its strategy for promoting Scottish trade and inward investment.

The Foreign Secretary accepted the Committee's recommendation that they see no reason why Dame Mariot should not take up this position, subject to the conditions that:

- Dame Mariot should not draw on privileged information available to her from her time in Crown Service; and
- For two years from her last day in service, Dame Mariot should not become personally involved in lobbying the UK Government on behalf of the Scottish Government or organisations it represents or promotes.

The letter containing the final advice was sent in July 2015 and she took up the role later that month.

Lt Gen Mayall

Lt Gen Mayall left his role as Senior Adviser for the Middle East in July 2015.

1. Senior Advisory Board Member, Greenhill & Co International

Lt Gen Mayall sought the Committee's advice to accept a role with Greenhill & Co International as a Senior Advisory Board Member.

The Committee took into account that Greenhill & Co International are an independent investment bank and as such have no defence engagements and no engagements with the MOD. The Committee also took into account that as Greenhill and the MOD's business environments are mutually exclusive, Lt Gen Mayall has not had access to any commercially sensitive information relevant to Greenhill's business or that of its competitors.

The Secretary of State for Defence has accepted the Committee's recommendation that there is no reason why Lt Gen Mayall should not take up this post subject to the following conditions:

- He should not draw on privileged information available to him from his time as a Crown Servant; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of Greenhill & Co International or its clients.

Terence Jagger recused himself from this case.

The [letter](#) containing the final decision was sent in July 2015 and the appointment was taken up in September 2015.

June Milligan

June Milligan left her role as Director General, Welsh Government, in September 2015.

1. Trustee, Young Foundation

Ms Milligan sought advice on accepting a role as an unpaid trustee for the Young Foundation.

When considering this application the Committee noted that Ms Milligan had attended one meeting with the Young Foundation while in office, relating to the charity commencing work in Wales. Although there was further contact between the Welsh Government and the Young Foundation, this occurred after Ms Milligan had left her post.

The First Minister accepted the Committee's recommendation that there was no reason why she should not take up this appointment subject to the following conditions:

- A waiting period of three months from her last day in Crown service (and six months from her last day in post);
- For two years from her last day of service, she should not become personally involved in lobbying the Welsh Government on behalf of the Young Foundation; and
- She should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) any privileged information available to her from her time in Crown service.

The [letter](#) containing the Committee's advice was sent in November 2015 and the appointment was taken up in January 2016.

Sir David Reddaway

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

1. Clerk, Worshipful Company of Goldsmiths

Sir David sought advice on taking up a part-time, paid appointment with the Worshipful Company of Goldsmiths. His new role will see him act as the Clerk of the Worshipful Company of Goldsmiths. He will act as the Chief Executive Officer and have responsibility of overall management of the company as well as being its representative in external functions.

When considering this application, the Committee noted that Sir David did not have any contractual dealings with the Worshipful Company of Goldsmiths, or its competitors, and was not responsible for those who did in his last two years of service. The Committee also took into account the views of the

Foreign & Commonwealth Office, who had no concerns with him undertaking this work.

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

- For two years from his last day of service (28 February 2014) he should not become personally involved in lobbying UK Government on behalf of his new employers; and
- He should not draw on privileged information available to him as a Crown Servant.

The [letter](#) containing the final decision was sent in December 2015 and he took up the role in January 2016.

2. Council Member, Gerson Lehrman Group

Sir David sought advice on accepting a role as a Council Member with Gerson Lehrman Group (GLG).

The Committee noted that Sir David had no contractual dealings with GLG during his last two years of service, nor was he responsible for people who did. He was not involved in the development or administration of any policy or decisions (including the award of grants) that could have affected GLG, and did not have access to any commercially sensitive information about any competitors.

The Committee took into account Sir David's commitment to not have any contact with the FCO in this role with GLG.

The Foreign Secretary accepted the Committee's advice that there was no reason why Sir David should not take up this appointment, subject to the following conditions:

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

The [letter](#) containing the final advice was sent to Sir David in May 2015.

3. Mentor, Royal College of Defence Studies

Sir David sought advice on accepting a role as a mentor at the Royal College of Defence Studies (employed by System Consultants Services).

The Committee noted that Sir David had no contractual dealings with his new employer during his last two years of service, nor was he responsible for people who did. He was not involved in the development or administration of

any policy or decisions (including the award of grants) that could have affected them, and did not have access to any commercially sensitive information about any competitors.

The Foreign Secretary accepted the Committee's advice that there was no reason why Sir David should not take up this appointment, subject to the following conditions:

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

The [letter](#) containing the final advice to Sir David was sent in May 2015.

Sir Richard Stagg

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

1. Trustee, Afghan Connect; Trustee, Turquoise Mountain Trust; and Director, Cheltenham Racecourse

Sir Richard Stagg sought the Committee's advice about three appointments with Afghan Connect, Turquoise Mountain Trust and Cheltenham Racecourse.

The Committee noted that Sir Richard had had no official dealings with Cheltenham Racecourse while in post, and that the role would involve no contact with Government. In relation to the appointments with Afghan Connection and the Turquoise Mountain Trust, the Committee noted that he had had some contact with the organisations while in post in Afghanistan. However, this contact was part of the normal course of his duties as Ambassador and he did not have any involvement in contracts or policy that could affect the two organisations.

The Committee noted with concern that Sir Richard had initially started all three of these posts, as he stated that he had not realised they would require an application. However, on the advice of the FCO he ceased dealing with them pending advice from the Committee and the Foreign Secretary's approval. The Committee reiterated that, at SMS3 level, all new appointments within two years of leaving office require an application under the business appointment rules.

The Foreign Secretary accepted the Committee's advice that there was no reason why Sir Richard should not take up these appointments, subject to the conditions that:

- Sir Richard should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) privileged information available to him as a Crown servant; and
- For two years from his last day of service, Sir Richard should not become personally involved in lobbying the UK Government on behalf of Afghan Connection, Cheltenham Racecourse, or the Turquoise Mountain Trust. In the case of Afghan Connection and the Turquoise Mountain Trust, this lobbying ban need not prevent routine communications with Government, though Sir Richard should not involve himself in applications for grants or other direct assistance.

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

Baroness Stroud

Baroness Stroud left her role as Special Adviser in the Department for Work and Pensions in September 2015.

1. Executive Director, Centre for Social Justice

Baroness Stroud sought advice on accepting an appointment as Executive Director of the Centre for Social Justice (CSJ).

When considering this application the Committee took into account that CSJ is a political think tank established by the current Secretary of State at DWP, and that Baroness Stroud was a founding member. They also noted that she had been the Executive Director of CSJ prior to her appointment as a Special Adviser, and so would be returning to her previous role.

The Committee also noted that due to the nature of its work CSJ, like other think tanks, has contact with DWP, but that there is no contractual relationship with the Department.

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

- Baroness Stroud should not draw on [disclose, or use, for the benefit of herself or CSJ] privileged information available to her from her time in Crown Service; and
- For two years from her last day of service, she should not become personally involved in lobbying the UK Government on behalf of CSJ, or its clients.

The [letter](#) containing the final advice was sent in September 2015 and she took up the role in October 2015.

Sir Peter Westmacott

Sir Peter Westmacott left his role as Ambassador to Washington DC in January 2016.

1. Resident Teaching Fellow, John F Kennedy School of Government, Harvard University

Sir Peter sought advice about an appointment as a Resident Teaching Fellow for Harvard University's Institute of Politics, John F Kennedy School of Government.

When considering this application, the Committee noted that the only contact Sir Peter had with Harvard University in his last two years of service was when, at the university's invitation, he spoke in an official capacity to the Kennedy School of Government in March 2014.

The Committee took into account the fact that, having consulted with Sir Peter's successor and with the Permanent Secretary, the FCO was content to waive its usual six month moratorium on former Ambassadors returning to their country of last posting for business purposes.

Taking into account the FCO's view that it would be beneficial for US/UK diplomatic relations for Sir Peter to take up this appointment without delay, and the fact that there are no propriety concerns in this case, the Committee is content to waive the three month waiting period usually applied to Permanent Secretary equivalents.

The Foreign Secretary accepted the Committee's advice that there was no reason why Sir Peter should not take up this appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself, or the organisation or person to which this advice refers) any privileged information available to him from his time in Crown service; and
- For two years from his last day in Crown service, he should not become personally involved in lobbying the UK Government on behalf of Harvard University or its partners.

The [letter](#) containing the final advice was sent in January 2016 and the appointment was announced later that month.

2. Public speaker, Harry Walker Agency

Sir Peter sought advice about taking up an appointment as a public speaker at Harry Walker Agency.

When considering this application, the Committee took into account that the FCO had no reservations regarding this appointment. The Committee noted that Sir Peter had no contractual dealings with the Harry Walker Agency while

in post, and was not responsible for anyone who did. Neither did he have access to commercial sensitive information about any of the Harry Walker Agency's competitors.

The Committee was mindful that, in contrast to the Harvard position where there was a public interest in Sir Peter being permitted to begin the appointment without delay, it would not be appropriate for Sir Peter to take up a business appointment - which in this case would involve publicly expressing his personal views - without a suitable waiting period.

The Foreign Secretary accepted the Committee's advice that there was no reason why Sir Peter should not take up this appointment, subject to the following conditions:

- For two years from his last day of service he should not become personally involved in lobbying the UK Government on behalf of his employer;
- He should not draw on privileged information available to him as a Civil Servant;
- A three-month waiting period between his last day of service and taking up this outside appointment.

The [letter](#) containing the final advice was sent in January 2016.

Kevin White

Kevin White left his role as HR Director General, Home Office, in July 2015.

1. Independent consultancy

Mr White sought the Committee's advice about setting up an independent consultancy, specialising in HR, advising clients on HR issues and providing executive coaching.

The Committee took into account that Mr White may provide coaching to Civil Service Learning (CSL) as he was already on the list from his time in Crown Service. It further noted that he had official dealings with Capita in the last two years, CSL's prime contractor. However the Committee noted that he had no responsibility for the contract award and no involvement in commercial discussions with them.

The Prime Minister has accepted the Committee's advice that there is no reason why Mr White should not set up as an independent consultant subject to the following conditions:

- He should not draw on privileged information available to him from his time in Civil Service;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of any of his clients or those he advises. (i.e He should not use his Whitehall contacts to

- influence policy or secure business for any organisations he works with);
and
- For two years from his last day in Civil Service, before accepting any new Commission he should make a case directly to the Committee to confirm that each individual commission he wishes to undertake would be permissible under the approved terms of the consultancy. (If, after the 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). In recommending this condition, the Committee agreed that there should be a de-minimis level for approvals whereby commissions lasting a day or less would not need to be considered by the Committee.

The Committee's [advice letter](#) was sent to Mr White's former Department in November 2015.

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