



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

Room G/08, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

January 2016

Dear Mr Bristow,

The Committee has considered your request to accept a commission chairing a new gambling industry committee to tackle money laundering. This position will involve: chairing meetings of the group; overseeing the coordination of industry responses to threats; promoting industry initiatives and practices to external stakeholders; and challenging the industry on its anti money laundering practices.

The role will involve working in collaboration with the Gambling Commission, an NDPB of DCMS, to produce industry good practice guidelines. The Committee noted that it is possible that you will also have contact with HM Treasury, given their interest in the industry, and with law enforcement, including the National Crime Agency, in this role. However, you have been clear that your position will not involve lobbying departments or Ministers for changes to any current or future legislation or policies.

The Committee agrees that this commission is permissible within the terms of your consultancy – which was to cover areas including: leadership and management development; risk and reputation management; governance and standards; and law enforcement, security and policing – and subject to the conditions previously applied.

The conditions that apply to your consultancy are:

- You should not draw on (disclose or use for the benefit of yourself or the organisation to which this advice refers) any privileged information available to you from your time in Crown service;
- For two years from your last day in service, you should not become personally involved in lobbying the UK Government on behalf of any of your clients or those you advise.

- For 12 months from your last day of service you 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 you have received approval to set up as an independent consultant, you must seek confirmation from the Committee directly that each subsequent individual commission is permissible under the terms of your 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 you will be expected to submit a fresh application.

The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant “should not engage in communication with Government - including Ministers, special advisers and officials - with a view to influencing a Government decision or policy [including applications for awards or grants] in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted”.

I would be grateful if you could let me know when you take up this piece of work, or if it is announced that you are to do so. This will enable the Committee to publish brief details on the regularly updated consolidated list on its website and in its next annual report. This letter may also be published (with relevant redactions of personal information).

Yours sincerely,

Catherine Millington