



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: SARAH RAPSON

The Committee has been asked to consider an application from Sarah Rapson, Director General of UK Visas and Immigration in the Home Office. She wishes to take up a new role as Director of Authorisations at the Financial Conduct Authority (FCA) when she leaves Crown service in October.

The Committee noted Ms Rapson's statement that she has had no contact with the FCA while in the Civil Service and has not been involved in any policies that could have affected them.

When considering this application the Committee took into account the fact that the Home Office had no concerns about this move, and that Ms Rapson was offered the role having applied for an advertised post.

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

- She 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, Ms Rapson should not become personally involved in lobbying the UK Government on behalf of the FCA. This does not preclude routine contact on matters aligned with Government policy.

By 'privileged information' we mean official information to which a Minister or Crown servant has had access as a consequence of his or her office or employment and which has not been made publicly available. Applicants are also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Civil Service Code or otherwise.

The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/Minister "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 ensure that we are informed as soon as Ms Rapson takes up this role, or if it is announced that she will do so (I enclose a form for this purpose). We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments which have not been taken up or announced, and this could lead to a false assumption being made about whether she had complied with the rules.

I should also be grateful if you would ask that Ms Rapson informs us if she proposes to extend or otherwise change the nature of her role as, depending on the circumstances, it may be necessary for her to make a fresh application.

Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website and include the main details of the application, together with the Advisory Committee's advice, in the regularly updated consolidated list on our website and in the next annual report.

Yours sincerely

Catherine Millington
Committee Secretariat