



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/08 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

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

22 November 2016

BUSINESS APPOINTMENT APPLICATION: (ADAM) GRAEME WILSON CBE

The Committee has been asked to consider an application from Graeme Wilson, former press secretary to the Prime Minister. He has sought advice on accepting a full-time, paid role as a Partner of Tulchan Communications, a financial communications advisory firm. His role will be to offer strategic advice to Tulchan Communications' clients on how to handle press and media issues they may face. He will also offer strategic advice on how the Government may handle issues affecting clients.

When considering this application, the Committee took into account that Mr Wilson has made clear that he will not lobby Government. The Committee notes that Mr Wilson's role may involve some contact with Government but it would expect him to refrain from making use, directly or indirectly, of his contacts to seek to obtain information that would give Tulchan Communications an unfair advantage.

The Committee also noted that Mr Wilson's former department had no propriety concerns about this appointment.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee's advice to the Permanent Secretary is that the appointment be 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 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 Tulchan Communications or its clients; and
- he should not make use, directly or indirectly, of his contacts in Government to seek to obtain information that would give Tulchan Communications or their clients an unfair advantage.

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. (As with all Special Advisers, the Committee makes this recommendation on the understanding that, if he has not already done so, Mr Wilson must confirm in writing to his department that he recognises that he continues to be bound by the provisions of the criminal law (including the Official Secrets Act), which protect certain categories of information, and by his duty of confidentiality owed to the Crown.)

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 should be grateful if you would let us know whether the Permanent Secretary is content to approve this application in line with the Committee's recommendation, and copy us into the final decision. I should also be grateful if you would ensure that we are informed as soon as Mr Wilson takes up this role, or if it is announced that he 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 that have not been taken up or announced. This could lead to a false assumption being made about whether Mr Wilson has complied with the rules.

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

Yours sincerely

Nicola Richardson
Committee Secretariat