From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS G/8 Ground Floor, 1 Horse Guards Road SW1A 2HQ Telephone: 020 7271 0839

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You asked for the Committee's advice about establishing an independent consultancy to advise businesses and other organisations on internationalisation, and accepting a commission under that consultancy with the University of Nottingham as Honorary Professor of International Relations and Advisor on Internationalisation.

When considering your application, the Committee took into account that you did not have direct official dealings with the University of Nottingham during your last two years in office. Furthermore, you had no dealings with any competitors of the university during that time. It was also noted that you graduated from the University of Nottingham in 1992.

Taking into account all the circumstances, our advice is that we see no reason why you should not set up your consultancy and undertake the the commission with the University of Nottingham, subject to the conditions that:

- you should not draw on any privileged information available to you as a Minister;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK Government on behalf of your clients or those you advise whether as an independent consultant or otherwise; and
- once you have received approval to set up as an independent consultant, for two years from your last day in ministerial office you must seek confirmation from the Committee directly that each 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.

It might be helpful if I add that lobbying is defined in the Business Appointment Rules in the following way: "Lobbying in this context means that the former civil servant should not engage in communication with Government - including Ministers, special advisers and officials - with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted".

I should be grateful if you would inform us as soon as you take up these appointments or, if earlier, when it is announced that you will do so, either by returning the enclosed form or by emailing this office at the above address. 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. This could lead to a false assumption being made about whether you had complied with the Ministerial Code. Similarly, I should be grateful if you would inform us if you propose to extend or otherwise change your roles with the University of Nottingham as, depending on the circumstances, it may be necessary for you to seek fresh advice.

Once the appointments have 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.

The Baroness Browning

Mr Jeremy Browne