



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: RICHARD DOUGLAS

The Committee has been asked to consider an application from Richard Douglas, former Director General for Finance and NHS in the Department of Health. He has applied to take up a position as Senior Counsel to Incisive Health, a health policy consultancy.

The Committee noted that this role will involve providing advice on internal governance and strategic direction, advising on public affairs strategies for clients, and supporting professional development through improving understanding of the general principles of policy creation and the workings of Government and the NHS. 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 Mr Douglas's former department, which had no concerns about this appointment. They also noted that there has been a gap of over seven months since he left Crown service and, given this, his former department does not believe he will have had access to information that could give Incisive Health 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.

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.

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 should be grateful if you could ensure that we are informed as soon as Mr Douglas takes up this position, 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 which have not been taken up or announced, and this could lead to a false assumption being made about whether he had complied with the rules.

I should also be grateful if you would ask that Mr Douglas informs us if he proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him 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