



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: AIR MARSHAL SIR CHRISTOPHER HARPER

The Committee has been asked to consider an application from Air Marshal Sir Christopher Harper, former Director General, NATO International Military Staff (DGIMS), who would like to establish an independent consultancy and take up a number of commissions.

Sir Christopher was DGIMS, based in Brussels, between July 2013 and July 2016. His last day in post was 27 July before commencing accrued annual and terminal leave and he will retire from Crown service on 27 January 2017.

Sir Christopher wishes to conduct business through his independent business consultancy, CH4C Global Ltd, which he formed in the summer (but which is dormant pending a decision on business appointments application). CH4C Global will principally offer geopolitical and strategic consulting services in the international defence and security sector. The company will not provide direct commercial or contracting advice.

Sir Christopher has been offered a commission to act as a mentor for Exercise Collective Action, the final wargame of the 2017 UK Higher Command and Staff Course, involving a NATO/Baltic defence scenario. This exercise will be held at the UK Defence Academy, Shrivenham during the period 27 March – 5 April 2017. He has also sought approval for the following speculative commissions:

- Member of a potential senior 'Global Advisory Board', Improbable Worlds Ltd.
- Senior advisor and mentor for senior leadership team, Rescue Global.
- Advisor on international relations, contemporary risk-management in the security and defence domain, and capability gap analysis and mitigation with L-3 Communications. L-3 UK has stressed that they would not anticipate Sir Christopher being involved with any of their work involving the UK MOD.
- Non-Resident Senior Fellow, The Atlantic Council.

He has had no official dealings or relationships with any of the organisations detailed above.

When considering this application, the Committee noted that Sir Christopher had spent the last seven years in various NATO-related appointments working in the Netherlands and Belgium and has had no commercial or contractual responsibilities.

The Committee took into account that Sir Christopher completed his last day as Director General of the NATO International Military Staff on 27 July. Due to an amalgamation of repatriation leave; relocation leave; resettlement leave; annual leave; annual leave carried forward from previous years, and terminal leave, his last day of Service will be 27 January 2017. He will have no official duties or contact with NATO, the MOD or the RAF between these dates.

The Committee also took into account the fact that the Countersigning Officer, Commercial Head and MOD panel raised no concerns about the consultancy, subject to conditions on lobbying and advising on bids or contracts relating to the MOD.

The Committee considered that given the connection between the nature of his consultancy and his former NATO roles, it was appropriate for there to be a gap between his last role and setting up an independent consultancy. However, given the time between last day in post and last day of Crown service, the Committee thought it appropriate for the waiting period to run from last day in post.

The Secretary of State accepted the Committee's recommendation that Sir Christopher's independent consultancy (and the commissions listed above) be subject to the following conditions:

- A waiting period of six months from his last day in post;
- He should not draw on any privileged information available to him from his time in Crown service;
- For two years from his last day in Crown service, he should not become personally involved in lobbying the UK Government on behalf of any of his clients or those he advises;
- For 12 months from his last day of service he should not undertake any work as a consultant that involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the MOD or its trading funds;
- For two years from his last day of service, before accepting any new commission he should apply to the Committee for approval to confirm that it is acceptable under the Committee's guidelines. In considering the matter on such further reference, the Committee may seek the views of relevant departments. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application).
- Further, should subsequent elements of any of the commissions that he has described change or expand in such a way that they fall outside the terms of his application, he should return to the Committee for advice on that particular piece of work.

The conditions set out above apply to Sir Christopher acting either directly or through his company CH4C Global Limited.

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 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 should be grateful if you would ensure that we are informed as soon as Sir Christopher takes up work under his consultancy, 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 Sir Christopher informs us if he proposes to extend or otherwise change the nature of his consultancy as, depending on the circumstances, it may be necessary for him to make a fresh application.

Once the consultancy has been publicly announced or commissions taken up under it, 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

Nicola Richardson
Committee Secretariat