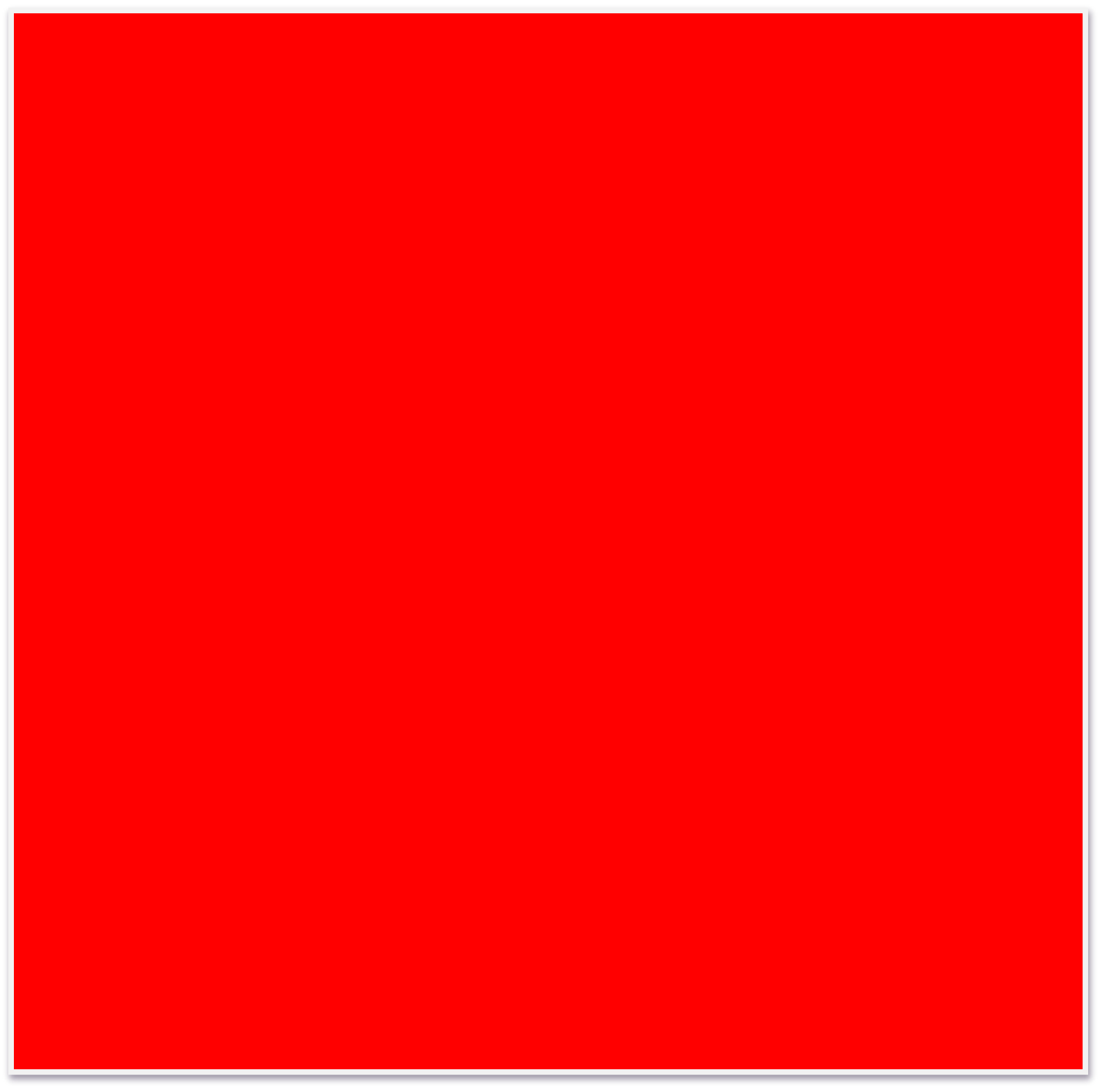




Advisory Committee on Business Appointments

Eighteenth Annual Report 2016-2017



20 July 2017

Dear Prime Minister,

This letter accompanies the eighteenth report of the Advisory Committee on Business Appointments, which covers the year to 31 March 2017.

The Committee continued to see a high volume of applications in 2016-17, with the numbers similar to those dealt with in the preceding year. This was in part due to the change of Prime Minister in July 2016 and following Ministerial reshuffle, combined with the on-going effect of the May 2015 General Election. The Committee gave advice on 104 applications from former Ministers in 2016-17, compared to 123 applications in 2015-16 (substantially higher than the 49 dealt with in 2014-15). There were 140 applications from former Crown servants, compared with 110 in 2015-16 (89 in 2014-15).

It was a challenging year for the Secretariat; with new personnel settling in after a period of change and an increase in casework. This included many cases which required significant work by the Secretariat; in particular, seeking further information from applicants about the nature of proposed roles; and former Government departments about individuals' responsibilities held whilst in office. This year 70% of applications were dealt with within our target deadlines, compared to 75% in 2015-16.

Those Ministers who left Government at the May 2015 General Election are no longer subject to the Business Appointment Rules, which apply for two years from last day of service. However, the Committee will continue to see applications from those leaving Ministerial posts, including those who left Government in July 2016 and following the recent General Election. The Committee will continue to work hard to provide a timely service to applicants, without compromising on the careful consideration afforded to each case.

I was pleased that the Government implemented the Committee's suggestion to tighten the definition of lobbying in the Rules and included the full text of the Rules as part of the Ministerial Code and Code of Conduct for Special Advisers, which all Ministers and Special Advisers receive on taking office.

During the year, I continued to visit Departments to raise awareness of the Rules and discuss Department-specific issues with Permanent Secretaries, and this programme of visits is on-going. I also met John Manzoni, Permanent Secretary of the Cabinet Office to discuss the challenges presented by former public servants taking up appointments outside Government and opportunities for improvements to the Business Appointments process.

The Committee has also continued to be as transparent as possible in the advice letters published on our website. We endeavour to put in the public domain as much detail as we can about our consideration of each individual case, including information we are given by applicants and the advice we receive from relevant Departments. Transparency is a central part of the checks and balances of the current system and ever more important, given

the heightened media scrutiny and parliamentary interest in business appointments issues that we have seen in recent years.

It is the view of successive governments that society benefits when those with experience in public administration are able to move into roles in business, the voluntary sector or other areas of public life. Equally the Government has a growing need to seek resources, experience and expertise from outside Government. This has the potential to increase the number of short-term appointments to Government and the number of individuals seeking to return to outside appointments upon leaving office.

However, this must be balanced against the risks of an appointment being seen as a reward for decisions made while in office or that an organisation may gain an unfair advantage by employing a former Crown servant or Minister. These risks are greater when an individual seeks to move into a role within the same sector for which he or she had responsibility while in office, which is why the Committee will often recommend more stringent conditions in such cases, such as a waiting period or specific restrictions on the type of work an individual can engage in.

My Committee continues to apply the Government's Business Appointment Rules with these issues in mind. However, the Committee is conscious that there is some unease about the principle of people moving between the public and private sectors and concern about the lack of a statutory system with enforcement powers. Any change to the current system would be a decision for the Government but we believe it is vitally important to discuss these issues on the basis of evidence and with a shared understanding of the impact of any major change to the system in financial, legal and public policy terms.

I am pleased that the Public Administration and Constitutional Affairs Committee (PACAC)'s report "[Managing Ministers' and officials' conflicts of interest: time for clearer values, principles and action](#)", published on 24 April 2017, adopted the Committee's suggestion, as set out in its [written submission](#), that there should be a cost/ benefit analysis of PACAC's proposal that there should be a move to a statutory scheme with a prohibited period at the end of public service/ ministerial office. This would demonstrate at what point a statutory scheme would impact on recruitment.

PACAC's report has also adopted the Committee's suggestion that a non-executive director should be appointed on each departmental board with responsibility for oversight of the Rules. The Committee believes that senior, independent, board-level oversight would help to facilitate good governance of departments' business appointment processes.

The Committee awaits the Government's response to PACAC's report with interest.

I would also like to pay tribute to my fellow Committee members and our small secretariat who diligently serve the public through their detailed and fair

consideration of each individual case that comes before us in line with the Rules we are given.

Yours sincerely,

A handwritten signature in black ink that reads "Angela Browning". The signature is written in a cursive style with a long horizontal flourish at the end of the name.

The Baroness Browning

Advisory Committee on Business Appointments
Eighteenth Annual Report
2016-2017

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Part 1 - The Committee

The Committee's role

1. The Advisory Committee on Business Appointments (the Committee) was established by the then Prime Minister, Harold Wilson, in 1975. It is an independent, advisory, non-departmental public body, sponsored by the Cabinet Office.
2. The Government's Business Appointments Rules on outside appointments¹ (the Rules) apply to both Crown servants and Ministers after they leave office. The Committee provides independent advice² on the application of the Government's Rules in relation to the most senior Crown servants (civil servants at Director General-level and above, and their equivalents); and to all former Ministers of the UK, Scottish and Welsh Governments.³
3. During the reporting period the Committee advised on 140 appointments of former Crown servants and on 104 appointments of former Ministers.
4. Information about how the Committee approaches its work is set out in Parts 2 to 5 of this report.

Membership

5. The Committee has eight members, appointed by the Prime Minister. All members are appointed for a single non-renewable term of five years. Three members are political appointees; nominated by the Conservative, Labour and Liberal Democrat parties; and a further five are independent members, who were appointed following fair and open competition, in accordance with the Commissioner for Public Appointments' Code of Practice (replaced this year by the Government's Governance Code). The appointment of Baroness Browning as Chair of the Committee was also conducted in line with the Commissioner's Code, following her earlier nomination by the Conservative Party as that party's member.

¹ Equivalent versions of the Rules are in place for the Diplomatic Service, armed forces and intelligence agencies.

² Advice is provided to the Foreign Secretary if the applicant is from the diplomatic service, GCHQ or SIS; to the Defence Secretary for most Ministry of Defence staff, both civilian and military; to the First Ministers of Scotland and Wales in the case of staff working in those Devolved Administrations; to the relevant Permanent Secretary if the applicant is a special adviser; and to the Prime Minister for all other Crown servants.

³ Advice is provided direct to former Ministers.

6. The membership of the Committee, which has remained the same throughout the reporting period, is:

- Mark Addison, independent member
- Sir Alex Allan, independent member
- Baroness (Angela) Browning, Conservative member and Chair
- Lord (Michael) German, Liberal Democrat member
- Mary Jo Jacobi, independent member
- Terence Jagger, independent member
- Baroness (Helen) Liddell of Coatdyke, Labour member
- John Wood, independent member

7. Biographies of the Committee's members are at Annex A.

Expenditure

8. The Committee's expenditure figures are published annually in the Civil Service Commission's audited Accounts, reflecting the fact that the Civil Service Commission provides secretariat support for the Committee.⁴ The figures in the audited accounts include the cost of accommodation and other service charges paid to the Cabinet Office, the Committee's share of which was approximately £82,000 in 2016-17.

9. Excluding the service charges mentioned above, the Committee's total expenditure for 2016-17 was £199,00, slightly lower than the £218,000 incurred in 2015-16. Staff costs remained the largest element of the Committee's expenditure at £172,000 in 2016-17 (compared with £177,000 in 2015-16).

10. The Committee members' honoraria of £8,000 per annum for the Chair and £3,000 for each of the other members remained unchanged from last year and totalled £29,000.

11. Other costs included the cost of legal advice and the press officer contract.

Governance

12. The Committee has a [Code of Practice](#), which is published on gov.uk

The Committee maintains a [register of its members' interests](#), also available on gov.uk

⁴ <http://civilservicecommission.independent.gov.uk/publications/annual-reports/>

Parliamentary scrutiny

13. On 25 October 2016 Baroness Browning appeared before the Public Administration and Constitutional Affairs Committee (PACAC) to give evidence to PACAC's inquiry into the role and effectiveness of ACOBA.
14. The full [transcript](#) of her oral evidence and the [written submission](#) from the Committee can be found on the PACAC pages on the UK Parliament's website⁵.
15. Recognising the debate around the effectiveness of the current Business Appointments system, and the need to take an evidence-based approach to discussing these issues, the Committee made a case to the inquiry for a cost/ benefit analysis of a statutory scheme. The evidence suggested that this should include consideration of whether there should be a 'waiting period' at the end of public service/ ministerial office; what activities might be prohibited; what sanctions would apply to breaches and how they might be investigated and enforced. It should also explore the impact of adopting a statutory scheme in financial, legal and public policy terms.
16. The Committee also proposed that a non-executive director should be appointed on each departmental board with responsibility for oversight of the Rules. The Committee believes that senior, independent, board-level oversight would help to facilitate good governance of departments' business appointment processes.
17. PACAC concluded its inquiry and published its report: "Managing Ministers' and officials' conflicts of interest: time for clearer values, principles and action" on 24 April 2017. The Committee looks forward to the Government's response and stands ready to contribute any further evidence required for further consideration of these issues.

⁵ <https://www.parliament.uk/business/committees/committees-a-z/commons-select/public-administration-and-constitutional-affairs-committee/inquiries/parliament-2015/acoba-and-independent-adviser-on-ministers-interests-16-17/>

Part 2 – The Rules

Purpose

18. The Business Appointments Rules are set by the Government. The Committee's remit is to provide advice on appointments against this framework.
19. It has been the view of successive Governments that it is in the public interest for people with experience of public administration to be able to move into business, the voluntary sector or other areas of public life. In its evidence to the recent PACAC inquiry on the role and effectiveness of ACOBA the Government stated:

“This interchange of skills and experience is good for our national life and a matter of fairness for those wishing to continue their careers after a period of public service.

Through the application of the Business Appointments Rules, the Government aims to:

- ***maintain public confidence that there is no conflict of interest between a person's previous role and a new appointment;***
- ***protect an individual's legitimate wish to be able to move into other sectors when their time of public service in government comes to an end; and***
- ***ensure that there is a beneficial sharing of expertise between the public, voluntary and private sectors.”***

Scope

20. The [Business Appointment Rules for Civil Servants](#) – which apply equally to civil servants and special advisers serving the UK Government, the Scottish Government and the Welsh Government – can be found on the Committee's pages on gov.uk and on Departmental intranets. The Rules are designed to uphold the core values in the Civil Service Code, of integrity, honesty, objectivity and impartiality⁶.
21. The Rules for Civil Servants set out that their purpose is to avoid any reasonable concerns that:

⁶ As temporary political appointees, special advisers are exempt from the requirements to behave with objectivity and impartiality, but are bound by the values of integrity and honesty.

- a civil servant might be influenced in carrying out his or her official duties by the hope or expectation of future employment with a particular firm or organisation, or in a specific sector; or
- on leaving the Civil Service, a former civil servant might improperly exploit privileged access to contacts in Government or sensitive information; or
- a particular firm or organisation might gain an improper advantage by employing someone who, in the course of their official duties, has had access to: i) information relating to unannounced or proposed developments in Government policy, knowledge of which may affect the prospective employer or any competitors; or ii) commercially valuable or sensitive information about any competitors.

22. Equivalent versions of the Rules are in place for Ministers, the diplomatic service, intelligence agencies, and armed forces (members of which, along with civil servants, are referred to as Crown servants for the purposes of this report).

23. The [Business Appointment Rules for Former Ministers](#) state that the purpose is to counter suspicion that:

- the decisions and statements of a serving Minister might be influenced by the hope or expectation of future employment with a particular firm or organisation; or
- an employer could make improper use of official information to which a former Minister has had access; or
- there may be cause for concern about the appointment in some other particular respect.

Part 3 – The Committee’s Approach

The decision-making process

24. When formulating its advice, the Committee is required to strike a balance between the right of people to earn a living after leaving Government and any justified public concern about the circumstances of an outside appointment.

25. It is often necessary for the Secretariat to seek additional information from applicants, or their former departments, to assist the Committee in preparing its advice. Where necessary the Secretariat will request information about the nature of the proposed contract an individual would have with their prospective employer; or approach the employer for more information about the appointment. The type of information that the Committee considers when deciding what advice to give includes:

- The nature of the proposed role.
- Whether the role is paid or unpaid.
- Whether the role will include contact with Government.
- Whether the individual had contact with their proposed employer during their previous two years in office (including the details of any meetings that took place and whether the individual was involved in awarding any grants or contracts) or with the particular commercial sector to which they are seeking to move.
- Whether the individual’s former department has an on-going relationship with the employer, contractual or otherwise.

26. The Committee takes a consistent approach to the applications it receives, taking into account the conditions it has recommended in similar cases. However, no two cases are the same and the Committee considers each one on its merits in light of the specific facts of each case. This ensures that its advice is fair, reasonable and proportionate to the legitimate interests that the Committee has been set up to protect.

27. As made clear in its [Guidance for former Ministers](#)⁷, significant involvement with a sector will increase the likelihood of the Committee recommending a waiting period.

28. The Committee will tailor its advice to address any concerns that arise in any given case. For example, in cases where the individual had a

⁷ The Cabinet Office is responsible for guidance for civil servants.

commercial role in Government, the Committee will usually recommend that they are restricted from working on the terms of bids or contracts relating to the work of their former department.

29. The Rules allow, in exceptional circumstances, for the Committee to advise that an appointment is unsuitable. However, past experience has shown that, in those rare cases when the Committee indicates informally to an applicant that it is likely to consider a particular appointment to be unsuitable or to recommend a substantial waiting period, it is usually the case that the application is subsequently amended. Often, the change in role is so significant that the Committee's provisional advice can be revised, as it is no longer considered to be unsuitable. In other cases the application is withdrawn.
30. During this reporting period, 8 applications were withdrawn, for a variety of reasons. As only the details of appointments that progress fully and are taken up are published, the Committee's website and reports do not show any unsuitable appointments. Nor do they show how the nature of initially potentially unsuitable appointments may have subsequently been modified during the course of the Committee's consideration. If an applicant were advised that an appointment was unsuitable and subsequently took up the post, the advice would be published once the Committee became aware the post had been taken up.

The lobbying ban and contact with Government

31. As a general principle, former Ministers and Crown servants are required to observe a two-year ban on lobbying the particular administration within the UK that they served while in Government. However, the Committee retains the flexibility to extend the lobbying ban to cover other administrations if the circumstances of an application warrant this.
32. In December 2016 the Government amended the description of the lobbying ban in the Rules, at the suggestion of the Committee, to clarify that the lobbying ban means that the individual:

"...should not engage in communication with Government (including Ministers, special advisers and officials/ public office holders) - wherever it takes place – with a view to influencing a Government decision, policy or contract award/ grant in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted or with whom they hold office."

33. The Committee will rarely waive or shorten the lobbying ban as it considers this to be an important condition in guarding against the risk, either real or perceived, that a former Crown servant or Minister might influence a Government decision or policy to serve their own interests or the interests of their employer.
34. The Rules permit the Committee to qualify the lobbying ban to make clear that this restriction need not prevent individuals communicating with Government on matters that are an integral part of the normal course of business for their new employers, where appropriate. In each case the Committee will focus on whether the particular activity, when considered in the specific circumstances of each individual case, raises propriety issues that the Committee must mitigate. For example, the Committee advised in one case that the individual could communicate a report's findings to Government, but could not make use of their Ministerial contacts to influence policy or secure funding on their employer's behalf. The Department was supportive of the appointment and the Committee considered that in the individual circumstances of the case there was nothing improper in that specifically defined contact taking place.
35. During this reporting period the Committee decided to extend the terms of the lobbying ban it recommends in cases where a former Minister or Crown servant is proposing to take up a role in the same sector that he or she was involved with while in office. This extension to the condition makes it clear that the organisation may not make use of the individual's contacts in Government and/or Crown service, to influence policy or secure business or funding for any organisations he or she works with, whether directly or indirectly.

Taking into account a current public role

36. Former Ministers may continue to represent Government in some capacity, for example, as a Trade Envoy or special representative. Such roles may involve privileged access to information and could create potential conflicts of interest between their current role representing Government and their proposed outside employment.
37. The Committee's [Guidance for former Ministers](#) sets out information about the Committee's approach to dealing with applications of this type. The Committee will consider whether to extend the restrictions it would normally impose to take account of any continuing government role, for example by extending any condition around drawing on privileged information to information deriving from that role. It is also likely to recommend that the individual makes clear in any activities he or she

undertakes on behalf of new employers that he or she is acting as the employers' representative and not on behalf of, or representing, Government. It may recommend an additional waiting period where there is a relationship between the post-Ministerial role and the outside appointment.

Retrospective applications

38. The Government amended the Rules in 2014 to make clear that retrospective applications will not normally be accepted. The Committee needs to be free to offer the most appropriate advice in any situation without it appearing to be constrained by an appointment already having been announced, or an individual already having signed a contract or taken up a post.
39. The Committee will make its concerns public when applications are received retrospectively by publishing the letter it writes to the individual (in the case of former Ministers) or the Department (in the case of former Crown servants). The Committee takes this approach in the expectation that drawing attention to a failure to submit an application will encourage others to follow the correct process. It also means that any improper appointment does not pass without comment. The Committee has also decided to express its concerns publically where it comes to the Committee's attention that individuals have failed to submit applications before accepting jobs.
40. There were 9 such cases during the reporting period, included in Annexes C and D.

Payment for waiting periods

41. The Committee notes that the Rules allow for a Department to continue to pay former civil servants or special advisers who are required to observe a waiting period before taking up an outside appointment. However, the Committee has agreed that any payments of this kind are not relevant to the Committee's consideration.

Transparency

42. The Committee publishes its advice on all appointments it has considered that are subsequently taken up or announced⁸. It makes public as much

⁸ With the exception of the appointments of a small number of individuals from the intelligence agencies, where information may be withheld for security reasons.

detail as it is able to, after taking into account its responsibilities under data protection and freedom of information legislation.

43. It is through this transparency, as originally recommended by the Committee on Standards in Public Life, that all those involved in the business appointments process (including applicants, government Departments, outside employers and the Committee itself) are accountable to the public. Equally, if approached about an individual who has not submitted an application to the Committee when he or she should have done under the Rules, the Committee will also make clear that no application has been received.
44. The Committee's advice and the other material it publishes about how it operates are available on its website⁹.
45. The Committee welcomes the Government's commitment to transparency in relation to the outside appointments of former senior civil servants that are considered internally by Departments and do not come before the Committee for consideration. Details of these applications are published on the relevant Departmental pages of gov.uk.
46. Since March 2010 the minutes of all Committee meetings have been published. In 2016-17 the Committee met four times to discuss a range of issues. The Committee will continue to publish minutes of future meetings once it has approved them.
47. Committee members follow a strict policy of declaring any individual interests related to a case and, if necessary, recusing themselves. When a Committee member recuses himself or herself from an application, this is published alongside the Committee's advice on the relevant case.
48. As a public authority, the Committee is required to respond to requests for information in accordance with the Freedom of Information Act 2000 (FOIA). During the reporting period 9 requests were responded to, and two further requests were received and responded to in the reporting period for 2017/2018.
49. In January 2017 the Information Commissioner's Office's (ICO) ruled in favour of the Committee's application of the FOIA following a complaint considered by the ICO in relation to the Committee's handling of a FOIA request. The ICO's [decision notice](#) is available on its website.

⁹ <https://www.gov.uk/government/organisations/advisory-committee-on-business-appointments>

50. In last year's annual report it was reported that the [ICO had similarly upheld](#) the Committee's decision on a request under FOIA in February 2016 and that the complainant had appealed the ICO's decision to the Tribunal. The appeals process is ongoing.

Part 4 - Ministers

The Ministerial Codes

51. The Ministerial Codes for the UK Government, Scottish Government and Welsh Government all require former Ministers to seek and abide by the Committee's advice before taking up appointments in the two-year period after they leave Ministerial office. The Rules are now annexed to the Ministerial Code for the UK Government, following a suggestion made by the Committee.
52. All three Codes are based on the premise which also underpins the Rules, that it is in the public interest for former Ministers with experience in Government to be able to move into business or into other areas of public life, and be able to start a new career or resume a former one. It is, however, equally important that when a former Minister takes up a particular appointment or employment, there should be no cause for any suspicion of impropriety.

Applications

53. In the reporting period, the Committee advised 52 former Ministers in relation to 104 appointments, including 16 commissions under the terms of independent consultancies in respect of which the Committee had given advice.
54. The number of Ministers seeking advice rose slightly and the number of applications dropped slightly this reporting period (for 2015-16 they were 33 and 123 respectively). The continued high volume of applications can largely be attributed to the change in Prime Minister in July 2016 and resulting Ministerial reshuffle and the 2015 UK General Election.
55. Of the 104 appointments, 17 had not been taken up as of 31 May 2017. This may have been for a variety of reasons, including: the applicant decided not to take up the appointment; or the applicant applied speculatively and either did not go ahead or it had not *yet* been taken up. The Committee's advice in relation to appointments that have been taken up or announced is published on its website. If and when others are taken up, the Committee's advice will be published.

The process

56. Former Ministers are asked to complete an application form, which is available on the [Committee's guidance pages](#) of the gov.uk website. The Committee asks applicants to provide as detailed a picture of the proposed appointment as possible, so it can provide fully informed advice. It is often necessary to seek further details about the nature of the proposed role. The Committee will also seek information on the application from the Minister's former Department(s). This may include details of any official contact between the Minister and the employing organisation; the nature of any relationship between the organisation and the Department and any other information that the Department considers relevant to the Committee's consideration under the Business Appointment Rules. The Committee may also seek further confidential evidence from other sources, for example the Minister's proposed employer or their competitors. All applications are treated in strict confidence and remain confidential until appointments are taken up or publicly announced.
57. The Committee provides its advice direct to the former Minister. It aims to provide its advice within 15 working days of receipt of an application. However, the complexity of some cases, and the need to seek information from the Minister's former Department(s), means it is not possible for all cases to be fully considered within this timeframe. During the reporting period, the Committee provided its advice to former Ministers within 15 working days in 66% of cases (84% received advice within 20 working days). The Committee provided advice to Ministers within 15 working days in 64% of cases in 2015-16 and 51% of cases in 2014-15.
58. The advice to former Ministers will typically include a ban on making use of privileged information available to them while in post and a two-year lobbying ban. Other conditions may be added, tailored to address the risks around individual appointments. Former Cabinet members of the UK Government are routinely subject to a minimum three-month waiting period after leaving office. While this waiting period can be waived if justified by the circumstances of the case, the Committee chose not to do so in any of the cases it considered during the reporting period. The Committee can recommend a waiting period of up to two years. In exceptional circumstances, the Committee can recommend that a particular appointment is unsuitable (although the caveat set out in paragraph 30, Part 3, explaining why the Committee's website and reports do not show any unsuitable appointments, should be noted here).
59. The Committee's advice is normally published when the former Minister has advised the Committee that he or she has taken up or announced an

appointment. We do not publish our advice where an appointment is not subsequently taken up.

60. The Committee will consider requests for continuing confidentiality once an appointment has been taken up, but a compelling case must be made to the Committee for doing so. The Committee will give no undertaking longer than three months, at the end of which the situation is reviewed. There were no such instances in this reporting period.
61. When the Chair is made aware that a Minister has left office, she will write to remind them of the need to ask the Committee for advice on all outside appointments for a two-year period.
62. Graphs showing the number of requests for advice year-on-year and the numbers of requests by Department for this reporting period are at Annex B.
63. Details of the Committee's advice on the outside appointments of former Ministers in 2016-17 are at Annex C.

Part 5 – Crown Servants

Applications

64. The Rules apply to all Crown servants¹⁰, including special advisers. The Committee is responsible for providing independent advice on their applications in relation to the most senior Crown servants who wish to take up appointments within two years of leaving Crown service.
65. The Rules specify that applications from special advisers “of equivalent standing” to civil servants at Director General¹¹ level and above need to be considered by the Committee. As civil service and special adviser pay bands do not mirror each other exactly, Departments may need to exercise judgement, in consultation with the Cabinet Office and Committee secretariat where necessary, as to whether special advisers’ applications should be referred to the Committee.
66. Departments deal with more junior applications under their own arrangements, and publish details of the appointments as part of their own transparency data. Permanent Secretaries are responsible for the operation of the Rules in their Departments.
67. In the reporting period, the Committee advised 55 Crown servants in relation to 140 appointments, including 54 commissions under the terms of independent consultancies in respect of which the Committee had given advice. This compares with 36 Crown servants and 110 appointments in 2015-16, and 41 and 89 respectively in 2014-15.
68. Of the 140 appointments, 23 had not been taken up as of 31 May 2017. Possible reasons for this are explained at paragraph 56 above.

The process

69. Applicants are asked to complete a standard application form which is available on the Committee’s website. The form requests details of their current and previous posts as well as information on the proposed appointment, including whether or not it was advertised and if it will involve dealings with their former Department or government more generally. Applicants must also state if they have had any contractual or official dealings with their prospective employer, competitors of their prospective

¹⁰ In this context, the Civil Service, Diplomatic Service, armed forces and intelligence agencies.

¹¹ Senior Civil Service pay band 3

employer or the sector in which the employer operates over the previous two years; and if they have been involved in policy development or the award of grants that could affect either the prospective employer or its competitors.

70. Applicants must submit the application to both their countersigning officer and the Department's HR division for them to provide their assessments. The Department then sends the completed application to the Committee's secretariat. The Committee draws on the information provided by the Department and countersigning officer to inform its consideration of the application.
71. It is often necessary to seek further details about the nature of the proposed role from the applicant. The Secretariat may also seek further information from the Crown servant's former Department(s), such as the details of any official contact between the Crown servant and the employing organisation and the nature of any relationship between the organisation and the Department. The Committee may also seek further confidential evidence from other sources, for example the Crown servant's proposed employer or their competitors.
72. The Committee considers each case individually against the Rules. It collects wider evidence where necessary, for example it might seek the views of other Departments, including the Cabinet Office, as "owner" of the Rules and it will conduct its own research. In some instances the Committee will meet applicants to discuss the proposed appointment further.
73. The Committee aims to provide its advice within 20 working days of receiving a fully completed application form. As each case is considered on its merits and some are complex, it is not possible to achieve this target in all cases. During this reporting period, 73% of cases were dealt with within the 20-day target. (78% received advice within 25 working days). This compares with 86% in 2015-16 and 67% in 2014-15.
74. As a general principle, former Crown servants at Director General level and above, and their equivalents, will be required to observe a two-year lobbying ban.
75. Former Crown servants at the equivalent of Permanent Secretary-level or above will be required to observe a minimum three-month waiting period after their last day of paid service. This waiting period can be waived if justified by the circumstances of the case. The Committee chose to waive the three month waiting period once during the reporting period. In this

case, the Committee recognised the public interest in an individual taking up a post immediately to undertake a particular piece of work with a charity that specialises in conflict resolution (in complex and dangerous conflict areas).

76. The Committee also chose to shorten the three-month waiting period by five days in one case relating to an unpaid appointment at a university in order to allow the individual to attend a university council meeting. As with Ministers, the Committee can recommend a waiting period of up to two years.

77. Once the Committee has agreed its advice it writes to the relevant final decision-maker (see footnote 2), who then considers the application and the Committee's recommendation. Once he or she has made the decision the Committee is informed, as are the Department and applicant.

78. The applicant is responsible for informing the Committee when he or she has taken up the appointment, or it has been announced. The Department is responsible for informing prospective employers of any conditions that have been attached to the approval of the appointment. Once the Committee has been informed it will publish the details of the appointment and its advice on its website.

79. Until an appointment is taken up or announced, the Committee undertakes to treat all applications confidentially. It does not publish its advice on appointments not taken up.

80. Graphs showing the number of requests for advice year-on-year and the numbers of requests by Department for this reporting period are at Annex B.

81. Details of the Committee's advice on the outside appointments of former Crown servants in 2016-17 are at Annex D.

Annex A - Biographies of Committee Members

Mark Addison joined the Department of Employment in 1978 and subsequently worked in a number of central Government Departments in operational and policy roles. He was the Chief Executive of the Crown Prosecution Service (1998-2001) and held various senior positions in the Department for Environment, Food and Rural Affairs (2001-2006). After leaving the civil service in 2006 Mark took on portfolio roles. He was a Civil Service Commissioner (2007-2012). He was a Non-Executive Director of Salix Finance Ltd (2006-11), a Board member at the National Archives (2007-2012) and a member of Council at the Consumers' Association (2010-2016). He was Chair of the Nursing and Midwifery Council from 2012 until the end of 2014 and a Public Appointments Assessor for the Commissioner for Public Appointments from 2012 until the end of 2016. At present, he is Chair of Dorset County Hospital NHS Foundation Trust; a Trustee and Vice Chair of the Charity for Civil Servants; a member of the State Honours Committee; an Associate with Alpine Consulting; and a Visiting Professor at Cass Business School.

Sir Alex Allan had a long career in the civil service, including roles as Principal Private Secretary to the Chancellor of the Exchequer and to the Prime Minister; as High Commissioner to Australia; as the Government's "e-Envoy"; as permanent secretary at the Ministry of Justice; and as Chairman of the Joint Intelligence Committee. He is currently the Prime Minister's Independent Adviser on Ministers' Interests and Chair of the QC Appointments Panel.

Baroness (Angela) Browning was a teacher, auxiliary nurse, and management consultant before entering Parliament. She was MP for Tiverton (1992-1997) and for Tiverton and Honiton (1997-2010). She was Parliamentary Private Secretary to Michael Forsyth as Minister of State at the Department of Employment (1993-1994) and Parliamentary Secretary at the Ministry of Agriculture, Fisheries and Food (1994-1997). She was made a life peer in 2010 and was Government Spokesperson for the Home Office in the House of Lords, and Minister of State for Crime Prevention and Anti-Social Behaviour Reduction at the Home Office in 2011. She is a former member of the Public Accounts Committee. She has also been an Electoral Commissioner (2010-2012). She is currently a member of the EU Select Committee and the EU Home Affairs Sub Committee; Vice President of both the National Autistic Society and the Alzheimer's Society; Vice President of the Institute of Sales and Marketing and a consultant for Cumberlege, Eden and Partners Ltd.

Lord (Michael) German led the Liberal Democrat group on Cardiff City Council for 12 years between 1983 and 1995. In 1997 he was awarded the OBE for political and community service in Wales. In 1999 he was elected to represent South Wales East in the first ever elections for the National Assembly for Wales. A year earlier he had been elected by his Party to be their leader in waiting for the National Assembly. In 2000 he took the party into a coalition government, holding the post of Deputy First Minister, and also

various ministerial portfolios including the Economy, Europe and Rural Affairs. He led the Party in the National Assembly until December 2008, latterly chairing its Environment and Sustainability Committee. In 2007 he became the overall leader of the Welsh Liberal Democrats - a post which until then had been designated for an MP at Westminster. In June 2010 he left the National Assembly to join the House of Lords. He is currently the Chairman of the Anglo Azerbaijani Society; President of Dolen Cymru; and President of Monmouth, Brecon and Abergavenny Canals Trust.

Mary Jo Jacobi is a consultant on reputation, brand and crisis management and international business strategy. She is also a Non-Executive Director of The Weir Group plc, Mulvaney Capital Management LLC and Panafsat and a member of the International Advisory Council of APCO Worldwide. She held senior executive positions in the UK at Royal Dutch Shell, Lehman Brothers and HSBC Holdings and in the United States at BP America and Drexel Burnham Lambert. She was also a Non-Executive Director of Tate and Lyle plc. Mary Jo was appointed Assistant United States Secretary of Commerce by President George H W Bush and served as Special Assistant for Business Liaison to President Ronald Reagan. She also served on the staff of the US Senate Committee on Commerce. From 2005-2010 she was a Civil Service Commissioner in Great Britain. She is a Fellow of the RSA and a lifetime member of the Royal Institution of Great Britain and the Worshipful Company of International Bankers. Currently she is an Advisor and Faculty Member at Gerson Lehrman Group/Gerson Lehrman Institute; and Managing Director at Mary Jo Jacobi Consulting LLC. She is also a Trustee of Loyola University of New Orleans.

Terence Jagger's early career was in investor relations and strategy development with Shell, American Express, Burmah Oil and Unigate. After a Masters degree in Finance, he joined the civil service in 1995, where he worked in the Ministry of Defence until 2011. His roles included managing the PFI programme, leading the QinetiQ privatisation, Director Financial Management, and political advisor to the NATO commander in Afghanistan (2006-7). From 2011 to 2015 he was Chief Executive of Crown Agents, the international development company working in Africa and Asia. He previously served as a non-executive or trustee of the UK-Japan 21st Century Group, the Met Office, the Gloucestershire and the London Wildlife Trusts and the London Library. He is Chair of Bath Spa University; a Non-Executive Director of the London Pension Funds Authority, the Marine Management Organisation and the Single Source Regulations Office; Chair of the Referrals Committee at the Single Source Regulations Office; and a trustee of Tree Aid.

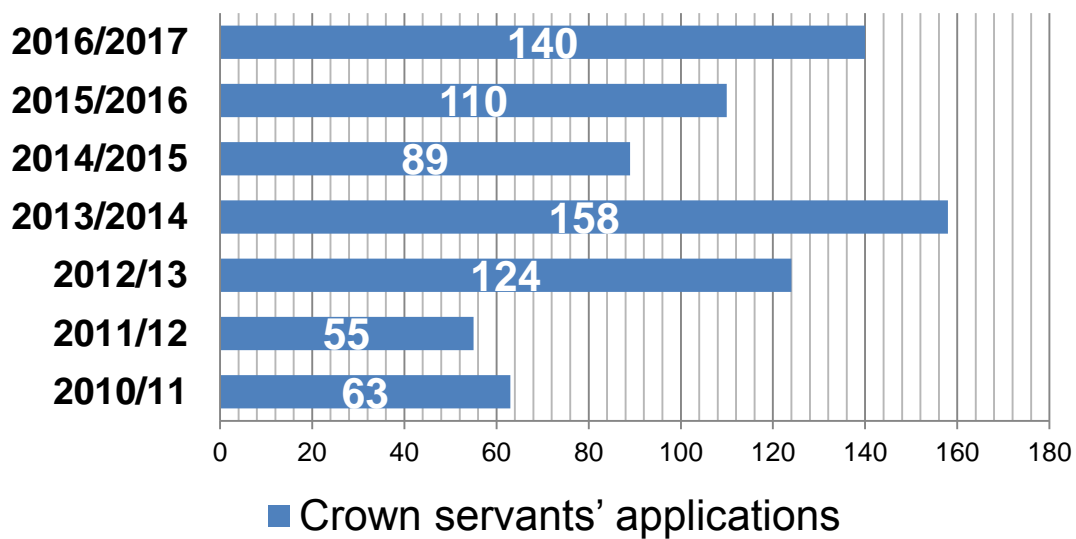
Baroness (Helen) Liddell of Coatdyke was MP for Monklands East (1994-1997) and then for Airdrie and Shotts until 2005. She held a number of Ministerial positions including Economic Secretary to the Treasury, Energy Minister and Minister of State for Transport before becoming Secretary of State for Scotland (2001-2003). She was British High Commissioner to Australia until 2009 and was made a life peer in 2010. Baroness Liddell was part of the review of the circumstances surrounding the helicopter crash on the Mull of Kintyre at the request of the Coalition Government and was on the

Joint Committee on the Prevention of Terrorism. She was a Non-Executive Director of the Offshore Renewable Energy Catapult from 2012-2015). She is currently Chairman at the Good Governance Group and Annington; and a member of the Advisory Board at PWC. She is also a trustee of the Northcote Educational Trust and the Britain Australia Society Educational Trust.

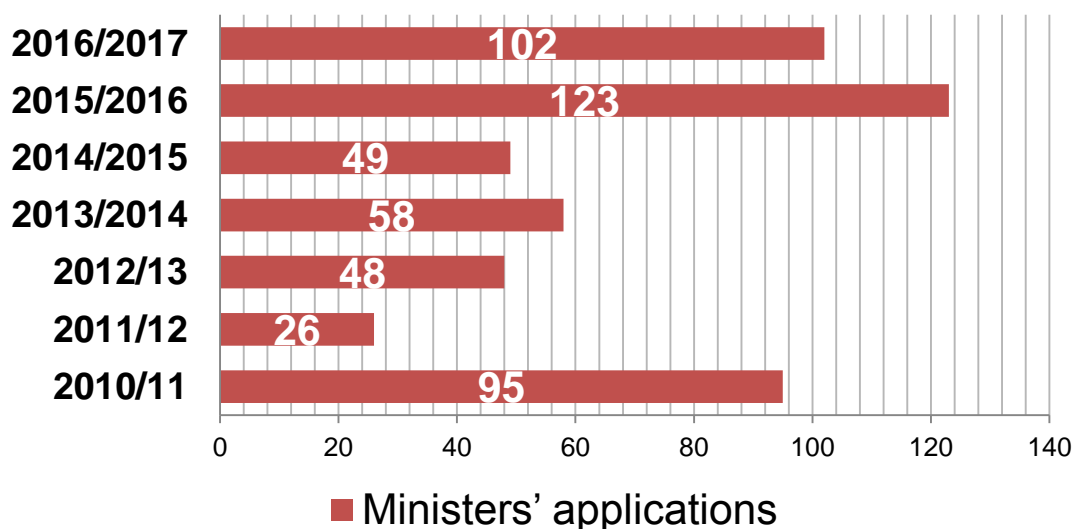
John Wood was appointed as an independent member of ACOBA in 2015. He joined Herbert Smith, now Herbert Smith Freehills LLP, the city and international law firm, in 1972 and was a partner from 1982 to 2007. From 2008 to 2014 he was a legal board member of the Charity Commission and its interim chair in 2012. He currently works with the Charity Commission for England and Wales as a consultant.

Annex B – Appointments advised on

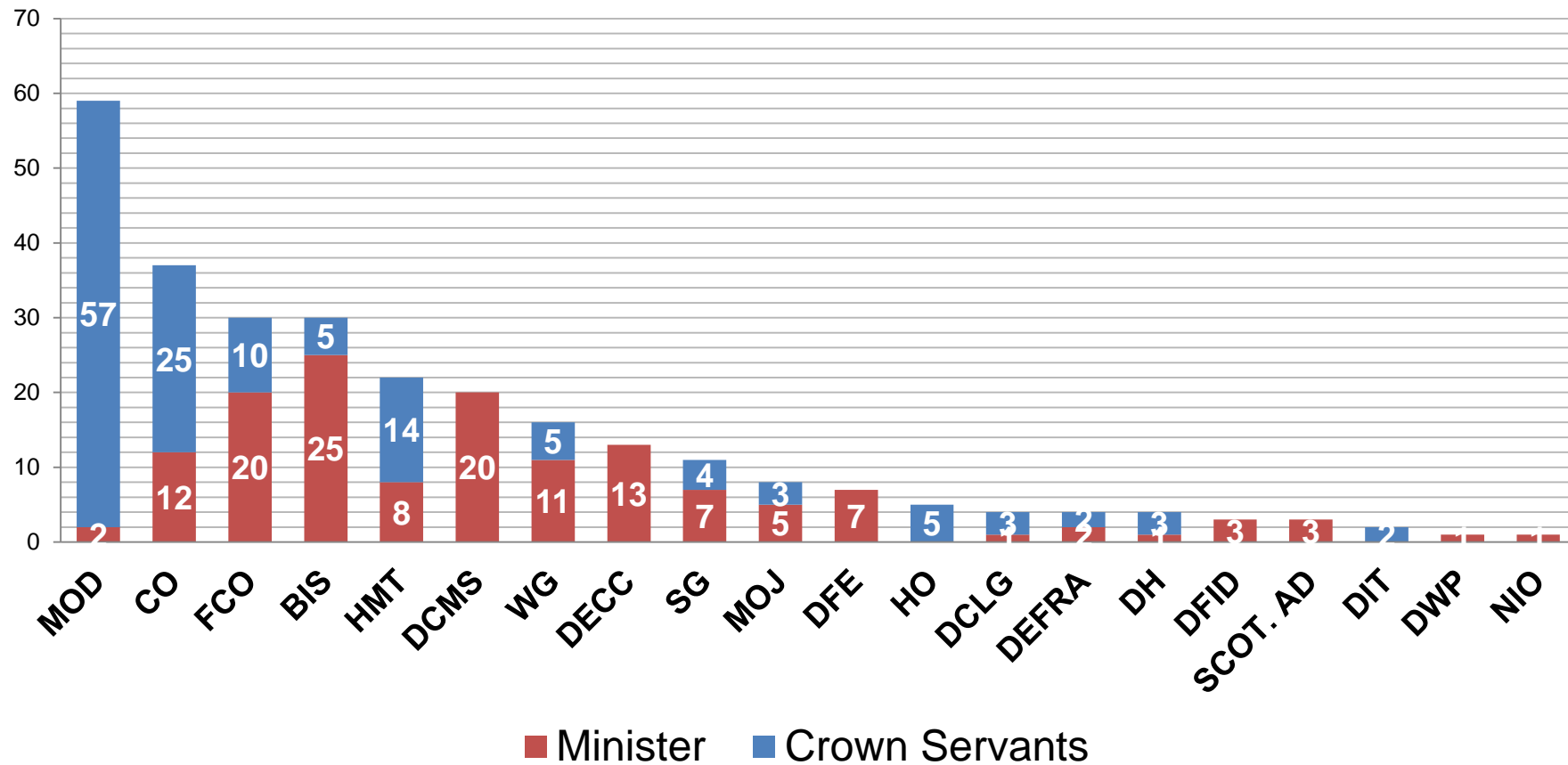
Number of requests for advice since 2010 - Former Crown Servants



Number of requests for advice since 2010 - Former Ministers



Number of appointments advised on, broken down by departments, 2016-17



Annex C – The Committee’s advice to former Ministers

The Committee publishes its advice on all appointments it has considered, on an on-going basis, when they are either taken up or announced.

This annex contains summaries of the advice provided by the Committee during the reporting period.

Leighton Andrews, Minister for Public Services, Welsh Government

Leighton Andrews left his role as Minister for Public Services, Welsh Government, in May 2016.

PROFESSOR OF PUBLIC SERVICE LEADERSHIP, CARDIFF UNIVERSITY

Mr Andrews sought the Committee’s advice on taking up an appointment as Professor of Practice in Public Service Leadership at Cardiff University.

The Committee noted that Mr Andrews had some dealings with Cardiff University while a Minister, particularly during his time as Minister for Education and Skills from 2011 until 2013. However, they noted that he left that role in 2013 and since then served as a backbench Assembly Member and Minister for Public Service. The Welsh Government confirmed that he was not involved in any decisions that should preclude him from taking up this appointment.

Taking into account all the circumstances, the Committee advised Mr Andrews that it saw no reason why he should not take up this role, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations to which this advice refers) any privileged information available to him as a Minister; and
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the Welsh Government on behalf of Cardiff University, its students, staff or alumni. Nor should he make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure business or funding on behalf of Cardiff University.

The Committee wrote its [advice letter](#) to Mr Andrews in August 2016 and the appointment was announced later that month.

TRUSTEE, CARDIFF CITY FC FOUNDATION

Mr Andrews sought the Committee's advice on taking up an appointment as an Honorary Trustee of Cardiff City FC Foundation.

When considering this application, the Committee noted that Mr Andrews had no dealings with Cardiff City FC during his last two years in ministerial office and that the role would involve no contact with the Welsh Government.

The Committee advised Mr Andrews that there was no reason why he should not take up this role, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations to which this advice refers) any privileged information available to him as a Minister; and
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the Welsh Government on behalf of Cardiff City FC or its Foundation

The Committee wrote its [advice letter](#) to Mr Andrews in June 2016 and the appointment was taken up in August 2016.

DIRECTOR, CWMNI DIGIDOL

Mr Andrews sought the Committee's advice on taking up an appointment as a Director of Cwmni Digidol, a start-up company developing a Welsh Language app for smartphones, which he formed in early 2014.

The Committee noted that Mr Andrews previously sought its advice about establishing Cwmni Digidol in early 2014, and was a director of the company until he relinquished the post on rejoining the Welsh Government later that year.

The Committee noted that Mr Andrews had no dealings with Cwmni Digidol during his last two years in office and that the appointment will not involve any contact with the Welsh Government.

The Committee advised Mr Andrews that it could see no reason why he should not take up this post, subject to the following conditions:

- 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 as a Minister;
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the Welsh Government on behalf of Cwmni Digidol, its partners or clients; and
- For two years from his last day in ministerial office, Cwmni Digidol should not receive or seek investment or a contractual relationship with any

organisation or person with whom the Education and Public Services Group entered into any contractual relationship during his term in office.

The Committee wrote its [advice letter](#) to Mr Andrews in June 2016 and he took up the appointment in July 2016.

MEMBER OF THE ADVISORY BOARD, LEARNING POSSIBILITIES

Mr Andrews sought the Committee's advice on taking up an appointment as a member of Learning Possibilities' Advisory Board.

The Committee noted that as part-time, paid, member of the board, Mr Andrews role would be to advise on maximising the organisation's impact in Wales and expanding the provision of learning platforms in England and globally.

The Committee took into account that the role may involve contact with the Welsh Government, as Learning Possibilities is a supplier to the Government. However, the role would focus on business strategy and would not involve lobbying Government. The Committee also considered that during his last two years in office, Mr Andrews had no official dealings with Learning Possibilities, nor with any of their competitors.

The Committee advised Mr Andrews that, in accordance with the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- 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 as a Minister; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the Welsh Government on behalf of Learning Possibilities.

The Committee wrote its [advice letter](#) to Mr Andrews in October 2016 and he took up the appointment in November 2016.

CHAIR, DIGITAL TASKFORCE, NATIONAL ASSEMBLY FOR WALES

Mr Andrews sought advice on taking up an appointment as Chair of the National Assembly for Wales' (NAFW) Digital Task Force.

The Committee noted this is a part-time, unpaid appointment of around 12 days work per year. As Chair he will provide recommendations on the most effective ways in which NAFW can deliver engaging and accessible news and information about its work; aiming to increase levels of public understanding and engagement, specifically with audiences currently disengaged with politics and Welsh affairs.

The Committee took into account that whilst Mr Andrews had some official dealings with his prospective employer, as a Minister accountable to the National Assembly - this appointment is unlikely to include any contact or dealings with his former department, or Government in general.

The Committee also noted that Mr Andrews' former department had no concerns about him taking up this role.

The Committee advised Mr Andrews that, in accordance with the Government's Business appointment Rules, the appointment be subject to the following conditions:

- 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 as a Minister; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the Welsh Government on behalf of the National Assembly for Wales.

The Committee wrote its [advice letter](#) to Mr Andrews in June 2016 and he took up the appointment in November 2016.

EDITORIAL BOARD MEMBER, JOURNAL OF PUBLIC AFFAIRS

Mr Andrews sought the Committee's advice on accepting an appointment with the Journal of Public Affairs as an editorial board member.

The Committee noted that this is a part-time, unpaid role, reviewing submitted articles.

When considering this application the Committee took into account that Mr Andrews was previously an editorial board member before taking up office in the Welsh Government and that the Permanent Secretary to the Welsh Government has no concerns about this appointment.

The Committee advised Mr Andrews that this appointment be subject to the following conditions:

- He should not draw on any privileged information available to him from his time in ministerial office; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the Welsh Government on behalf of The Journal of Public Affairs.

The Committee wrote its [advice letter](#) to Mr Andrews in November 2016 and the appointment commenced later that month.

EXTERNAL ADVISER TO THE ROYAL SOCIETY FOR THE ENCOURAGEMENT OF ARTS, MANUFACTURES AND COMMERCE

Mr Andrews sought the Committee's advice on accepting a new appointment as an External Adviser to the Royal Society for the encouragement of Arts, Manufactures and Commerce (the RSA).

The Committee noted that this role would involve advising the Public Services and Communities Change Aim Panel. It also took into consideration that Mr Andrews met the CEO of the RSA on one or two occasions while in office, and that the CEO spoke at the Welsh Government Public Service Leadership Summit. Mr Andrews also confirmed that he had met with several other think tanks in similar fields while in office, but did not have access to any commercially sensitive information about them and was not involved in any policy decisions of relevance. The Committee took into account that the Welsh Government confirmed Mr Andrews had very limited interaction with the organisation or its competitors and had no concerns about him taking up this appointment.

The Committee advised that, in accordance with the Government's Business Appointment Rules, the role be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the organisations to which this advice refers) any privileged information available to him as a Minister; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the Welsh Government on behalf of the RSA.

The Committee wrote its [advice letter](#) to Mr Andrews in August 2016.

Marco Biagi, Minister for Local Government & Community Empowerment, Scottish Government

Marco Biagi left his role as Minister for Local Government & Community Empowerment in the Scottish Government in May 2016.

SENIOR COUNSEL, MESSAGE MATTERS

Mr Biagi sought the Committee's advice about a part-time, paid appointment with Message Matters, a public relations and public affairs company.

The Committee noted that Mr Biagi's role would involve providing political analysis, writing a regular public blog hosted on the company website and promoting Message Matters to potential clients, both generally and through specific pitches.

When considering the application the Committee took into account that Message Matters is not an organisation with which Mr Biagi had any contact whilst a Minister and it is not an organisation with a relationship with the Scottish Government.

The Committee advised Mr Biagi that it could see no reason why he should not take up this role, subject to the following conditions:

- 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 ministerial office; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the Scottish Government on behalf of Message Matters, its partners or its clients or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure business on behalf of Message Matters.

The Committee wrote its [advice letter](#) to Mr Biagi in June 2016 and the appointment was taken up in July 2016.

Margaret Burgess, Minister for Housing and Welfare, Scottish Government

Margaret Burgess left her role as Minister for Housing and Welfare in the Scottish Government, in May 2016.

VOLUNTARY BOARD MEMBER, IRVINE HOUSING ASSOCIATION'S BOARD OF TRUSTEES

Ms Burgess sought the Committee's advice about taking up a part-time, unpaid, appointment as a voluntary board member of Irvine Housing Association's board of trustees.

The Committee noted that the appointment is unlikely to include any contact or dealings with the Scottish Government and that the level of contact Ms Burgess had with IHA while in office was the same as with any social landlord in Scotland. The Committee further noted that the Scottish Government's housing policy, for which Ms Burgess was responsible, affected every social landlord in Scotland equally and accrued no specific benefit to IHA.

The Committee advised Ms Burgess that it could see no reason why she should not take up this appointment, subject to the following conditions:

- She should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) any privileged information available to her from her time in ministerial office; and
- For two years from her last day in ministerial office she should not become personally involved in lobbying the Scottish Government on behalf of IHA

or its clients; or make use, directly or indirectly, of her contacts in the Scottish Government to influence policy or secure funding on behalf of IHA.

The Committee sent its [advice letter](#) to Ms Burgess in July 2016 and the appointment was taken up in August.

Rt Hon Sir Vince Cable, Secretary of State for Business, Innovation and Skills

Rt Hon Sir Vince Cable left his role as Secretary of State for Business, Innovation and Skills in May 2015.

NON-EXECUTIVE DIRECTOR, WHITE CAPSTAN LIMITED

Sir Vince sought the Committee's advice on taking up a new role as non-executive director of White Capstan Limited.

The Committee noted that he had declined a salary and requested that the company make a donation to charities, in lieu.

When considering the application the Committee took into account that the role will not require any engagement with the UK government. It also took into account that Sir Vince will have met a wide range of automotive original equipment manufacturers and supplier companies, both through the Auto Council and individually. However, given that 16 months have passed since he was Secretary of State for Business, Innovation and Skills (BIS), any information that he will have been party to is likely to be out of date.

The Committee sought the opinion of BIS's successor department, the Department for Business, Enterprise and Industrial Strategy, which did not have any concerns regarding the propriety of this appointment.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advised Sir Vince that the appointment be subject to the following conditions:

- That he should not draw on any privileged information available to him as a Minister; and
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of White Capstan Limited or the companies it owns.

The Committee wrote its [advice letter](#) to Sir Vince in October 2016 and he took up the role later that month.

NON-EXECUTIVE CHAIR OF HCT GROUP

Sir Vince sought the Committee's advice about accepting a part-time, unpaid role as non-executive Chair of HCT Group. HCT Group is a social enterprise bus operator providing a range of transport-related services.

The Committee sought the opinion of Sir Vince's former department which had no concerns about the propriety of this appointment. The Committee noted their view that any contact between HCT and Government would likely be with the Department for Transport and noted the lobbying restriction which applies to former Ministers.

The Committee's advice was that, under the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- he should not draw on any privileged information available to him as a Minister; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of HCT Group.

The Committee wrote its [advice letter](#) to Sir Vince in October 2016.

Rt Hon David Cameron, Prime Minister

Rt Hon David Cameron left his role as Prime Minister in July 2016.

CHAIRMAN, LSE-OXFORD COMMISSION ON GROWTH IN FRAGILE STATES

David Cameron sought the Committee's advice about taking up an unpaid appointment with the International Growth Centre (IGC), as Chairman of the LSE-Oxford Commission on Growth in Fragile States (the Commission).

The Committee noted that the IGC is an academic institution that aims to promote sustainable growth in developing countries through policy and research, and that Mr Cameron's role as Chairman will involve: providing input from a policy perspective on the different dimensions of state fragility that will be addressed by the commission; leading meetings between co-chairs and commissioners; and assisting in communicating and disseminating the Commission's reports and findings.

The Committee sought the views of the Permanent Secretary to the Cabinet Office who had no concerns about this appointment. It also considered that whilst the IGC is funded by the UK Department for International Development, the Commission is not and is fully funded through the London School of Economics and Oxford University.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time in ministerial office; and
- for two years from his last day in office he should not become personally involved in lobbying the UK Government on behalf of the International Growth Centre (IGC), or the LSE-Oxford Commission on Growth in Fragile States.

The Committee wrote its [advice letter](#) to Mr Cameron in December 2016 and the role was announced March 2017.

PRESIDENT, ALZHEIMER'S RESEARCH UK

David Cameron sought the Committee's advice about taking up an unpaid appointment as President of Alzheimer's Research UK.

The Committee noted that Mr Cameron's role would be to help grow the charity's global role as both a research funder and thought leader.

When considering this application the Committee took into account that the role is ambassadorial, and that it would not involve lobbying Ministers, officials or government departments. The Committee sought the views of the Permanent Secretary to the Cabinet Office who had no concerns about this appointment.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- he should not draw on any privileged information available to him from his time in ministerial office; and
- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of Alzheimer's Research UK or make use, directly or indirectly, of his contacts in Government to influence policy or secure funding on behalf of Alzheimer's Research UK.

The Committee wrote its [advice letter](#) to Mr Cameron in November 2016 and the role was announced in January 2017.

CHAIRMAN, NATIONAL CITIZEN SERVICE PATRONS; PUBLIC SPEAKER,
WASHINGTON SPEAKERS BUREAU

Mr Cameron sought the Committee's advice on registering with the Washington Speakers Bureau (WSB) and taking up an unpaid role as Chairman of the National Citizen Service Patrons (NCS).

The Committee noted that Mr Cameron would be registered with WSB and give speeches on the contemporary global political environment.

The Committee also noted that NCS is a youth development programme, and that Mr Cameron would be joining the NCS Patrons to establish and convene the panel of patrons. Mr Cameron was responsible for establishing the NCS as Prime Minister, and kept up to date with the organisation while in post. Although this is a publicly funded body, the Committee noted that his role will be unpaid, he will not lobby Government, and will not be involved in issues pertaining to the Board of Directors or Executive team around awarding of contracts or funding. His role will be ambassadorial and involve supporting a programme that emerged from his concept when Leader of the Opposition and gained cross-party support.

The Committee took into account that, as the former Prime Minister, Mr Cameron is subject to a standard three-month waiting period before taking up any outside appointment.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee's advice to Mr Cameron was that these appointments be subject to the following conditions:

- A three month waiting period from his last day in office;
- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him as Prime Minister; and
- For two years from his last day in office he should not become personally involved in lobbying the UK Government on behalf of WSB or its clients, or on behalf of the NCS Trust.

The Committee wrote its [advice letter](#) to Mr Cameron in September 2016. The appointment with NCS was announced in October 2016. Mr Cameron registered with WSB in December 2016.

Rt Hon Nick Clegg, Deputy Prime Minister

Rt Hon Nick Clegg left his role as Deputy Prime Minister in May 2015.

TRUSTEE, RADIX

Mr Clegg sought the Committee's advice about an unpaid appointment as a Trustee of Radix, a new think tank.

The Committee noted that Mr Clegg's role would involve overseeing the activities and finances of the organisation, along with the other trustees. They noted that Mr Clegg had no dealings with Radix while in ministerial office, and that his former department had no concerns about him taking up the post.

The Committee advised Mr Clegg that it could see no reason why he should not take up this role, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time as a Minister; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of Radix.

The Committee wrote its [advice letter](#) to Mr Clegg in July 2016 and the appointment was taken up later that month.

Rt Hon Sir Edward Davey, Secretary of State for Energy and Climate Change

Rt Hon Sir Edward Davey left his role as Secretary of State for Energy and Climate Change in May 2015.

PATRON, SUSTAINABLE FUTURES FOUNDATION

Sir Edward sought the Committee's advice about becoming an patron of the Sustainable Futures Foundation (SFF), a new charity being established to promote environmental sustainability for the public benefit.

The Committee noted that this was an unpaid role and would involve supporting SFF in developing projects, raising awareness by speaking in public about them - mainly at their own events - and helping raise money for their activities. They noted that he would initially be working to promote SFF's inaugural project, Solar Team GB.

The Committee advised Sir Edward that it saw no reason why he should not take up this appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time as a Minister; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of the Sustainable Futures Foundation (SFF), Solar Team GB or any of SFF's

projects. Nor should he make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure Government financing on behalf of SFF or its projects.

The Committee wrote its [advice letter](#) to Sir Edward in June 2016, and he took up the role in July 2016.

TRUSTEE, TOURISM FOR ALL

Sir Edward asked for the Committee's advice about becoming a Trustee of Tourism for All, a charity whose mission is to be a centre of expertise on accessible tourism, working for a world-class tourism experience for everyone. This is a part-time, unpaid position.

The Committee advised this appointment be subject to the following conditions:

- that he should not draw on (disclose or use for the benefit of yourself or the organisations or persons to which this advice refers) any privileged information available to you as a Minister;
- For two years from your his day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of Tourism For All.

The Committee sent it's [advice letter](#) in April 2016 and Sir Edward took up the appointment later that month.

Commissions

Since establishing the independent consultancy (in the area of energy and climate change, helping organisations to develop thought leadership in the energy and climate change sector; to understand past energy policies; and to understand how future policy in the UK, the EU and elsewhere might develop), the Committee has advised on the following commissions which have been taken up:

- [Fit for the Future \(taken up in April 2016\)](#)
- [Work on a project board examining the feasibility of establishing a new energy company \(taken up in April 2016\)](#)
- [ENGIE UK \(taken up following advice provided in June 2016\)](#)
- [Grantham Institutes \(LSE\) and the Association for Decentralised Energy \(taken up following advice provided in October 2016\)](#)
- [Next Energy Capital \(taken up in February 2017\)](#)
- [INGINE Wave Energy Systems Ltd\(taken up in February 2017\)](#)
- [Gerson Lehrman Group \(taken up in February 2017\)](#)
- [SIT Group \(taken up in May 2017\)](#)

Lord Deighton, Commercial Secretary to the Treasury

Lord Deighton left his role as Commercial Secretary to the Treasury in May 2015.

NON-EXECUTIVE DIRECTOR, SQUARE, INC

Lord Deighton sought the Committee's advice about an appointment as a non-executive director of Square, Inc. a US technology business in the financial services industry.

When considering this application the Committee noted that Lord Deighton did not have any official dealings with Square, Inc., competitors of the company or the sector in which they operate during his last two years in office; neither did he have access to commercially sensitive information or unannounced policy that could give Square, Inc. an unfair advantage. The appointment is not likely to include any contact or dealings with his former department (HM Treasury) or with Government more generally.

The Committee advised Lord Deighton that it could see no reason why he should not take up this appointment, 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 as a Minister; and
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of Square, Inc. or its subsidiaries or make use, directly or indirectly, of his contacts within Government and/or Crown service to influence policy or secure business on behalf of Square, Inc. or its subsidiaries.

The Committee wrote its [advice letter](#) to Lord Deighton in April 2016 and the appointment was announced in May 2016.

James Duddridge, Parliamentary Under Secretary of State, Foreign and Commonwealth Office

James Duddridge MP left his position as Parliamentary Under Secretary of State, Foreign and Commonwealth Office in July 2016.

ADVISOR, BRAND COMMUNICATIONS GROUP

James Duddridge sought the Committee's advice about taking up a paid, part-time appointment as an Advisor to Brand Communications Group (BCG), a company that focuses on building and promoting African brands.

Mr Duddridge explained that his role would be to advise the directors at BCG on doing business in Africa, as well as speaking at conferences.

When considering this application the Committee noted that during his time as a Minister Mr Duddridge had no contact with BCG, or any of its competitors. The Committee also took into account that his former department, the FCO, has no concerns about this appointment.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- he should not draw on any privileged information available to him as a Minister; and
- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of Brand Communications Group, its partners or clients or make use, directly or indirectly, of his contacts in Government and/ or Crown service to influence policy or secure business on behalf of Brand Communications Group and its clients.

The Committee wrote its [advice letter](#) to Mr Duddridge in December 2016 and he took up the role in January 2017.

Rt Hon Michael Gove, Lord Chancellor and Secretary of State for Justice

Rt Hon Michael Gove MP left his role as Lord Chancellor and Secretary of State for Justice in July 2016.

ADVISORY BOARD MEMBER, RED TAPE INITIATIVE

Michael Gove sought the Committee's advice about becoming a member of the advisory board of the Red Tape Initiative (RTI).

The Committee noted that the purpose of the RTI is to identify opportunities for repealing aspects of EU-derived regulation following the UK's decision to leave the EU. The RTI's proposals will be published for public debate and promoted on a non-partisan basis within Parliament. The role of the advisory board will be to provide views on what may be sensible and acceptable deregulatory measures. The role will be unpaid.

When considering the application, the Committee took into account that Mr Gove's former Department had no concerns about the appointment.

Taking into account the specific facts in this case in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- he should not draw on any privileged information available to him from his time in ministerial office; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of the Red Tape Initiative.

The Committee sent its [advice letter](#) to Mr Gove in December 2016 and the role was announced in April 2017.

PUBLIC SPEAKER, LONDON SPEAKER BUREAU AND CHARTWELL SPEAKERS

Mr Gove sought the Committee's advice about registering with the London Speaker Bureau and Chartwell Speakers.

When considering this application the Committee took into account that Mr Gove had no dealings with either agency while in office and there will be no contact involved with his former department or government more generally. The Committee consulted the Ministry of Justice, which had no concerns about Mr Gove registering with these agencies and taking up employment as a speaker.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- He should not draw on any privileged information available to him as a Minister;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the London Speaker Bureau, Chartwell Speakers, or their clients.

The Committee sent its [advice letter](#) to Mr Gove in October 2016 and he registered with both agencies that month.

COLUMNIST, THE TIMES

Mr Gove sought the Committee's advice about writing a weekly column for The Times on current affairs.

The Committee noted that Mr Gove is a journalist by profession. He worked for The Times full-time from 1995 to 2005 and wrote a weekly column from 1999 to 2009, prior to becoming a Minister.

When giving its advice the Committee took into account that the Ministry of Justice had no concerns about the appointment.

The Committee also took into account that, as a former Cabinet Minister, Mr Gove is subject to a standard three-month waiting period before taking up any outside appointment.

The Committee advised Mr Gove that it could see no reason why he should not take up this appointment, subject to the following conditions:

- A three-month waiting period from his last day in Ministerial office;
- He should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time as a Minister and;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of The Times.

The Committee sent its [advice letter](#) to Mr Gove in August 2016 and the appointment was announced in September.

Helen Grant, Parliamentary Under-Secretary of State, DCMS

Helen Grant left her role as Parliamentary Under-Secretary of State, DCMS, in May 2015.

NON-EXECUTIVE DIRECTOR OF CELL THERAPY LIMITED

Helen Grant sought the Committee's advice about become a Non-Executive Director of Cell Therapy Limited (Cell Therapy), which trades as Celixir.

Cell Therapy is a company that focuses on the research and development of medicine and bringing them to market - in particular to treat heart disease. It is also investigating the use of certain types of cells to treat diabetes and cancer.

The Committee took into consideration that Ms Grant had no dealings with Cell Therapy or any of its competitors whilst in office. Further, her former department were asked for their views on this appointment and they confirmed they had no concerns about this role.

The Committee also took into consideration the length of time that has passed since Ms Grant left Ministerial office, 21 months ago.

The Committee's advice was that the appointment be subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her as a Minister; and
- for two years from her last day in Ministerial office, she should not become personally involved in lobbying the UK Government on behalf of Cell Therapy Ltd.

The Committee wrote its [advice letter](#) to Ms Grant in March 2017 and the appointment was taken up in April 2017.

TRUSTEE, SOCIAL MOBILITY FOUNDATION

Ms Grant sought advice about an unpaid appointment as a Trustee of the Social Mobility Foundation, a charity that aims to make a practical improvement in social mobility for young people from low-income backgrounds.

The Committee noted that Ms Grant had no dealings with the Social Mobility Foundation while in office, that the role will be unpaid, and that her former department had no concerns with her taking up this post.

The Committee advised Ms Grant that it could see no reason why she should not take up this post, subject to the following conditions:

- She should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time as a Minister; and
- For two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of the Social Mobility Foundation.

The Committee wrote its [advice letter](#) to Ms Grant in June 2016 and she took up the role in July 2016.

Rt Hon William Hague, First Secretary of State and Leader of the House of Commons

Mr Hague left his role as First Secretary of State and Leader of the House of Commons in May 2015.

CONSULTANT, CITIGROUP

Lord Hague sought the Committee's advice on taking up employment with Citigroup as a consultant, providing advice on global, political and economic events.

The Committee noted that this is a paid, part-time role (involving approximately 30 days' work per year).

When considering the application, the Committee took into account that Lord Hague had no official dealings with Citigroup or its competitors during his last two years in office and that the appointment is not likely to include contact or dealings with Government.

The Committee sought the views of the Permanent Secretaries at the Cabinet Office and the Foreign and Commonwealth Office, who expressed no concerns about the appointment.

The Committee advised Lord Hague that this appointment be subject to the following conditions:

- That he should not draw on any privileged information available to him as a Minister;
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of Citigroup, its subsidiaries, partners or clients.

The Committee wrote its [advice letter](#) to Lord Hague in August 2016 and the appointment was announced in February 2017.

Mark Harper, Government Chief Whip

Mark Harper left his role as Government Chief Whip in July 2016.

SENIOR ADVISER TO THE LAW FIRM DWF LLP

Mr Harper sought the Committee's advice about an appointment as a Senior Adviser to the law firm DWF LLP. Mr Harper's role will include providing advice on Communications and strategy to clients and management. It is a part-time, paid role.

When considering the application, the Committee noted that he left office as the Government Chief Whip in July 2016, and that 18 months has passed since Mr Harper's last day in office as Minister for Disabled People. It also noted that whilst DWF LLP has an existing relationship with the Department for Work and Pensions (DWP), Mr Harper had no official dealings with DWF LLP, or their competitors, in his last two years in office. Neither Cabinet Office nor DWP had any propriety concerns about Mr Harper taking up this role.

The Committee advised that, in accordance with the Government's Business Appointment Rules, the appointment be made subject to the following conditions:

- 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 as a Minister; and

- for two years from his last day in ministerial office, he should not become personally involved in lobbying the Government on behalf of DWF LLP.

The [letter](#) containing the final decision was sent in November 2016 and the appointment was taken up/announced in February 2017.

Edwina Hart, Minister for Economy, Science and Transport, Welsh Government

Edwina Hart left her role as Minister for Economy, Science and Transport in the Welsh Government in May 2016.

MEMBER OF THE GREENSTEEL COUNCIL

Ms Hart sought the Committee's advice about accepting a new appointment as a member of the Greensteel Council (the Council) being set up by GFG Alliance.

Ms Hart told the Committee she would be joining the Council to provide strategic advice and guidance to help the executive team roll out the Greensteel vision; though as a member of the Council, Ms Hart would not be an employee or a consultant.

The Committee took into account that, while a Minister in the Welsh Government, Ms Hart had dealings with some of the companies involved in the GFG Alliance and she was involved in matters relating to the steel industry in Wales - this included some access to commercially sensitive information regarding constituent companies of the GFG Alliance and its competitor businesses.

Having sought the views of Ms Hart's former department, the Committee also took into account that Ms Hart had been involved in approving a loan and extension to Swansea Bay Tidal Lagoon, a subsidiary of Tidal Lagoons Ltd, and that Sanjeev Gupta (of GFG Alliance) is an investor in Tidal Lagoons Ltd. However, Ms Hart was not aware of his involvement as an investor at the time. The Committee also noted that it was a commercial loan for a project that the Welsh Government is supportive of and which went through the Welsh Government's standard due diligence processes for financial approvals.

Having considered all the facts in this case, the Committee felt a waiting period should be imposed, given the information Ms Hart previously had access to. The Committee advised that, under the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- waiting period of six months from Ms Hart's last day in ministerial office;

- she should not draw on (disclose or use for the benefit of herself or the organisations to which this advice refers) any privileged information available to her from her time in ministerial office; and
- for two years from Ms Hart's last day in ministerial office she should not become personally involved in lobbying the Welsh Government on behalf of the GFG Alliance or any of its constituent companies.

The Committee sent its [advice letter](#) in October 2016.

Norman Lamb, Minister for Care and Support, Department of Health

Norman Lamb MP left his role as Minister for Care and Support, Department of Health, in May 2015.

MEMBER OF THE ADVISORY BOARD, MONEY AND MENTAL HEALTH POLICY INSTITUTE

Mr Lamb sought advice on accepting an appointment as a member of the Advisory Board of the Money and Mental Health Policy Institute, a new organisation being constituted as a charity, which will conduct research and develop policy proposals to improve the lives of those with mental health conditions and financial problems.

The Committee noted that this was an unpaid appointment, and that the Institute was not established until after Mr Lamb had left ministerial office.

The Committee advised Mr Lamb that it could see no reason why he should not take up the appointment, 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 as a Minister; and
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of the Money and Mental Health Policy Institute.

The Committee wrote its [advice letter](#) to Mr Lamb in April 2016 and the appointment was taken up later that month.

Rt Hon David Laws, Minister of State for Schools and Minister of State, Cabinet Office

Rt Hon David Laws left his role as Minister of State for Schools and Minister of State in the Cabinet Office in May 2015.

BOARD MEMBER, WHOLE EDUCATION

David Laws sought the Committee's advice about taking up an unpaid role as a board member of Whole Education, a not-for-profit partnership of schools and organisations which facilitates shared learning, with the aim of equipping children with the range of skills, qualities and knowledge needed to succeed in adulthood.

When considering the application, the Committee took into account that Mr Laws' former Department had confirmed that it has no relationship with Whole Education. The Committee was mindful of the contact Mr Laws had with the chair of Whole Education during his appointment and term as Pupil Premium Champion; and that Mr Laws spoke at their conference in November 2013.

The Committee also took into consideration the length of time that had passed since Mr Laws left Ministerial office, 21 months ago.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- that he should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him as a Minister; and
- for two years from his last day in Ministerial office, he should not become personally involved in lobbying the UK Government on behalf of Whole Education or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure funding on behalf of Whole Education.

The Committee wrote its [advice letter](#) to Mr Laws in February 2017. He took up the role following the provision of the Committee's advice.

ADVISORY BOARD MEMBER, RED TAPE INITIATIVE

David Laws sought the Committee's advice about becoming a member of the advisory board of the Red Tape Initiative (RTI).

The Committee noted that the purpose of the RTI is to identify opportunities for repealing aspects of EU-derived regulation following the UK's decision to leave the EU. The RTI's proposals will be published for public debate and promoted on a non-partisan basis within Parliament. The role of the advisory board will be to provide views on what may be sensible and acceptable deregulatory measures. The role will be unpaid.

When considering the application, the Committee took into account that Mr Laws' former Departments had no concerns about the appointment.

Taking into account the specific facts in this case in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- he should not draw on any privileged information available to him from his time in ministerial office; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of the Red Tape Initiative.

The Committee sent its [advice letter](#) to Mr Laws in February 2017 and the role was announced in April 2017.

ADVISORY COUNCIL MEMBER, NEW SCHOOLS NETWORK

David Laws sought the Committee's advice about taking up a role as a member of the advisory board of New Schools Network, a charity that supports individuals and organisations to develop proposals for Free Schools.

When considering the application, the Committee took into account that the Department for Education (DfE) funds the New Schools Network through grants but that the work of the New Schools Network was not part of Mr Laws' responsibilities while he was a DfE Minister. It also noted that the role would not involve any contact or dealings with his former departments or with government more generally.

The Committee also took into account that neither DfE nor the Cabinet Office had any concerns about the propriety of the appointment, and over 12 months had passed since he left ministerial office.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised 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 as a Minister; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of New Schools Network or make use, directly or indirectly, of his contacts in Government and/or Crown Service to influence policy or secure funding on behalf of New Schools Network.

The Committee wrote its [advice letter](#) to Mr Laws in June 2016 and the role was announced in September 2016

Sir Oliver Letwin, Minister for Government Policy and Chancellor of the Duchy of Lancaster

Sir Oliver Letwin left his role as Minister for Government Policy and Chancellor of the Duchy of Lancaster in July 2016

CHAIR, RED TAPE INITIATIVE

Sir Oliver sought the Committee's advice about becoming Chair of a new think-tank formed by him called the Red Tape Initiative (RTI).

The Committee noted that the purpose of the RTI is to identify opportunities for repealing aspects of EU-derived regulation following the UK's decision to leave the EU. The RTI's proposals will be published for public debate and promoted on a non-partisan basis within Parliament. Sir Oliver's role as Chair will be to have general oversight of the work of the paid staff of the RTI and to meet with a wide range of business people and politicians to identify deregulatory measures. The role will be unpaid.

When considering this application the Committee took into account that Sir Oliver would present the recommendations for deregulation identified by the RTI to Ministers and Parliamentarians and that he expected to have discussions with officials about the feasibility of particular potential deregulatory measures identified by the RTI.

The Committee also took into account that Sir Oliver's former Department had no concerns about the appointment.

Taking into account the specific facts in this case in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- he should not draw on any privileged information available to him from his time in ministerial office; and
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of the Red Tape Initiative (RTI). This is not intended to prevent him from submitting recommendations to Government pursuant to his role as Chair and having discussions with officials about the feasibility of particular potential deregulatory measures identified by the RTI. However, the Committee would expect him to refrain from making use, directly or indirectly, of privileged access derived from his role as a Minister to influence Government policy on behalf of the RTI. The Committee also notes that with regard to his activities in Parliament he is subject to other rules.

The Committee sent its [advice letter](#) to Sir Oliver in November 2016 and the role was announced in April 2017.

Huw Lewis, Minister for Education and Skills, Welsh Government

Huw Lewis left his role as Minister for Education and Skills, Welsh Government, in May 2016.

CONSULTANT, UNIVERSITY OF SOUTH WALES

Mr Lewis sought the Committee's advice on a part time appointment as a Consultant for the University of South Wales, chairing a working group on the anti-poverty role of the university, overseeing its role in the Cardiff and Valleys City Deal and providing strategic advice on the university's role in teacher education.

When considering this application the Committee noted that, while Minister for Education and Skills, Mr Lewis had dealings with various universities. However, as funding and regulation of universities is conducted at arm's length, he was not involved in those areas, and the Welsh Government had no concerns about him taking up this role.

The Committee advised Mr Lewis that it could see no reason why he should not take up this role, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations to which this advice refers) any privileged information available to him as a Minister; and
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the Welsh Government on behalf of the University of South Wales, its students, staff or alumni. Nor should he make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure business or funding on behalf of the University of South Wales.

The Committee wrote its [advice letter](#) to Mr Lewis in September 2016 and the appointment was taken up later that month.

Lord Livingston of Parkhead, Minister of State for Trade and Investment

Lord Livingston of Parkhead left his role as Minister of State for Trade and Investment in May 2015.

ADVISORY BOARD MEMBER, LIVINGBRIDGE

Lord Livingston sought the Committee's advice about a part time role as a Member of the Advisory Board of Livingbridge, a private equity investor in SMEs.

When considering this application the Committee noted that Lord Livingston had no dealings with the organisation while in ministerial office, there is no relationship between the organisation and his former departments and the role will not include any lobbying of Government.

The Committee advised Lord Livingston that it could see no reason why he should not take up the appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time as a Minister; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of Livingbridge, its partners, subsidiaries or clients.

The Committee wrote its [advice letter](#) to Lord Livingston in June 2016 and the appointment was taken up in September 2016

Fiona MacLeod, Acting Minister for Children and Young People, Scottish Government

Fiona MacLeod left her role as Acting Minister for Children and Young People in the Scottish Government in August 2016.

MEMBER OF THE BOARD OF TRUSTEES, THE SCOTTISH BOOK TRUST

The Scottish Book Trust (the Trust) is a charity that promotes literacy, reading and writing in Scotland. Ms MacLeod explained her role will be part-time and unpaid, advising and supporting the governance of the organisation.

When considering this application the Committee noted that as a Chartered librarian, Ms MacLeod has an interest and expertise related to the work of the Trust; and as a Minister she was involved with several organisations who promote literacy. The Committee also took into account that whilst the Trust is actively involved with the Scottish Government around the delivery of certain projects (such as BookBug and The First Minister's Reading Challenge), Ms MacLeod had no direct involvement in any contractual arrangements with the Trust whilst she was in post.

The Committee also sought the views of the Permanent Secretary to the Scottish Government and noted she has no concerns about this appointment.

The Committee advised that, in accordance with the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) any privileged information available to her from her time in ministerial office; and
- for two years from her last day in ministerial office she should not become personally involved in lobbying the Scottish Government on behalf of the Scottish Book Trust, or make use, directly or indirectly, of her contacts in Government to influence policy or secure funding on behalf of the Scottish Book Trust.

The [letter](#) containing the Committee's final decision was sent in November 2016 and the appointment was subsequently taken up.

Rt Hon Lord Maude of Horsham, Minister for Trade and Investment

Rt Hon Lord Maude of Horsham left his role as Minister for Trade and Investment in March 2016.

ADVISORY BOARD MEMBER, IFM INVESTORS AND CHAIR, BOARD OF BRIGHTON COLLEGE INTERNATIONAL SCHOOLS

Lord Maude sought advice about taking up appointments with IFM Investors and Brighton College International Schools (BCIS).

The Committee noted that Lord Maude would become an Advisory Board member at IFM Investors, a global provider of investment services across infrastructure, debt investments, listed equities and private equity. This would be a paid role, which would involve 18 days' work a year. He would provide advice to the executives on strategy, investors and investments.

Lord Maude would also take up the position of Chair of the Board of Brighton College International Schools (BCIS). This role would be unremunerated. BCIS was established in 2009 as a subsidiary of Brighton College to plan and set up British-curriculum schools around the world under licence to Brighton College.

When considering these applications the Committee took into account that Lord Maude had no contact with IFM Investors during his last two years in Ministerial office and the Department for International Trade (DIT) has no relationship with the company.

The Committee was also mindful that neither role would involve contact with Government, twelve months had passed since his last day in Ministerial office

and Permanent Secretary at DIT had no reservations about these appointments.

The Committee advised Lord Maude that these appointments be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to him as a Minister; and
- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of IFM Investors or Brighton College International Schools or make use, directly or indirectly, of his contacts in Government to influence policy or secure business or funding on their behalf.

The Committee wrote its [advice letter](#) to Lord Maude in March 2017 and the appointments were taken up in April 2017.

Mark Addison recused himself from this application.

ADVISORY BOARD MEMBER, GPW

Lord Maude sought advice on becoming a member of the advisory board of GPW, a business intelligence organisation.

The Committee noted that Lord Maude would attend advisory board meetings, potentially introducing new clients to GPW and providing advice to the executives of GPW and possibly its clients.

The Committee noted that the role would not involve contact with Government, Lord Maude had no contact with GPW while in office, and he was unaware of the company having a relationship with his former department.

The Committee advised Lord Maude that this appointment be subject to the following conditions:

- He should not draw on any privileged information available to him as a Minister;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of GPW or its partners or clients. Nor should he make use, directly or indirectly, of his contacts within Government and/or Crown service to influence policy or secure business on behalf of GPW or its partners or clients.

The Committee wrote its [advice letter](#) to Lord Maude in October 2016 and the appointment was taken up in June 2017.

Mark Addison recused himself from this application.

CHAIRMAN, COGENT ELLIOTT GROUP LTD

Lord Maude sought advice on becoming Non Executive Chairman of Cogent Elliott Group Ltd, an advertising agency.

The Committee noted that this role would involve providing strategic leadership to the company and dealing with clients as and when appropriate. It would be a part time, paid, role involving around 20 days a year.

The Committee noted that the role would not involve contact with Government, Lord Maude had no contact with them while in office, and he was unaware of them having any relationship with his former department.

The Committee advised Lord Maude that it could see no reason why he should not take up this appointment subject to the following conditions:

- He should not draw on any privileged information available to him as a Minister;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of Cogent Elliott or their partners or clients. Nor should he make use, directly or indirectly, of his contacts within Government and/or Crown service to influence policy or secure business on behalf of Cogent Elliott or their partners or clients.

The Committee wrote its [advice letter](#) to Lord Maude in October 2016 and the appointment was announced later that month.

Mark Addison recused himself from this application.

SENIOR ADVISER, COVINGTON & BURLING LLP

Lord Maude sought advice on taking up a role as a Senior Adviser with Covington & Burling LLP.

The Committee noted that this role would involve providing advice to the firm and its clients on policy and regulatory issues, including on Brexit. The Committee noted that the role would not involve contact with Government, Lord Maude had no contact with the firm while in office, and he was unaware of them having any relationship with his former department.

It was felt that there should be a gap between Lord Maude's time in Government and his new advisory role with Covington & Burling LLP. However, the Committee noted that a gap of over six months had already occurred since his last day in ministerial office.

The Committee advised Lord Maude that it could see no reason why he should not take up this appointment, subject to the following conditions:

- He should not draw on any privileged information available to him as a Minister;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of Covington & Burling LLP or their partners or clients. Nor should he make use, directly or indirectly, of his contacts within Government and/or Crown service to influence policy or secure business on behalf of Covington & Burling LLP or their partners or clients.

The Committee wrote its [advice letter](#) to Lord Maude in October 2016 and the appointment was announced later that month.

Mark Addison recused himself from this application.

ADVISORY BOARD MEMBER, OAKNORTH BANK

Lord Maude sought advice from the Committee about becoming an advisory board member at OakNorth Bank, which deals with business and property finance and specialises in supporting the UK's growth businesses. The role is a part-time, paid post advising the executives on strategy and business development.

When considering this application the Committee noted that Lord Maude had limited contact with OakNorth Bank while in Ministerial office. The Committee also took into account that Lord Maude had no involvement with any relevant policy or regulatory issues, nor did he have access to commercially sensitive information about any of OakNorth Bank's competitors.

The Committee also considered the views of the Permanent Secretaries at FCO and BIS. There was a consensus that there should be a six-month gap between Lord Maude leaving Ministerial office and taking up this post, to prevent the perception of excessively close Government links. The Committee noted that the role would not likely include any contact or dealings with Lord Maude's former departments or Government more generally.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advised Lord Maude that the appointment be subject to the following conditions:

- a six-month waiting period from his last day in Ministerial office;
- he should not draw on any privileged information available to him from his time as a Minister; and
- for two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of OakNorth Bank or its customers or clients, or make use, directly or indirectly, of his contacts within Government and/or Crown service to influence policy or secure business on behalf of OakNorth Bank or its customers or clients.

The [letter](#) containing the final advice was sent in August 2016 and the appointment was announced in September.

Mark Addison recused himself from this application.

NON-EXECUTIVE DIRECTOR, SCALE-UP INSTITUTE

Lord Maude asked for the Committee's advice about accepting a part-time, unpaid role as a non-executive director of Scale-Up Institute, a not-for-profit organisation providing support for growing businesses.

When considering the application the Committee took into account Lord Maude's declaration that the appointment is not likely to include any contact or dealings with his former departments or government more generally.

The Committee noted that his previous role as Minister for Trade and Investment spanned FCO and BIS and so sought views from the Permanent Secretaries at both departments. Neither department raised concerns about the appointment. BIS commented that there is no formal relationship between the organisation and the department, although Lord Maude had official dealings with its founder Sherry Coutu on a couple of occasions.

Given that the Institute has a lobbying role and there is a connection between the responsibilities of Lord Maude's previous department (BIS) and this new role, the Committee decided that it would be appropriate to make clear that the Institute may not make use of his Whitehall contacts, whether directly or indirectly.

The Committee advised Lord Maude that, in accordance with the Government's Business appointment Rules, the appointment be subject to the following conditions:

- 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 service, he should not become personally involved in lobbying the UK Government on behalf of Scale-Up Institute, its partners or members, or make use, directly or indirectly, of his contacts within Government and/or Crown service to influence policy or secure business on behalf of Scale-Up Institute, its partners or members.

The Committee wrote its [advice letter](#) to Lord Maude in May 2016.

Mark Addison recused himself from this application.

ADVISORY BOARD MEMBER, ANVEST PARTNERS AND INDEPENDENT CONSULTANCY

Lord Maude sought the Committee's advice on becoming an advisory board member with Anvest Partners, a real estate investment company, and about establishing an independent consultancy.

The Committee noted that Anvest Partners is a new entity, and the role would be part time and involve providing advice to the executives on strategy, investors and investments. In relation to the independent consultancy, the Committee noted that it would provide advice, especially to non-UK Governments and administrations, on various matters but particularly focused on efficiency and administrative savings. They also noted Lord Maude's assurance that he would seek advice on specific assignments as they arise.

The Committee took into account the views of Lord Maude's former departments - FCO, BIS and Cabinet Office - none of which raised any concerns about the proposed appointment or the consultancy.

The Committee advised Lord Maude that, in accordance with the Government's Business appointment Rules, the appointment and consultancy be subject to the following conditions:

- He should not draw on any privileged information available to him from his time in ministerial office;
- For two years from his last day in ministerial office, he should not become personally involved in lobbying the UK Government on behalf of Anvest Partners, or 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 which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the Cabinet Office, FCO or BIS; and
- For two years from his last day of service, before accepting any new commission he should make a case directly to the Committee to confirm that each individual commission he wishes to undertake would be permissible under the approved terms of the consultancy. (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).

The Committee wrote its [advice letter](#) to Lord Maude in April 2016 and he took up the appointment with Anvest Partners later that month.

Mark Addison recused himself from this application.

Rt Hon Nicky Morgan, Secretary of State for Education and Minister for Women and Equalities

Rt Hon Nicky Morgan left her roles as Secretary of State for Education and Minister for Women and Equalities in July 2016.

MEMBER OF THE ADVISORY BOARD, FINITO EDUCATION LTD

Ms Morgan sought advice from the Committee about taking up a role with Finito Education Limited (Finito) as a member of the Advisory Board.

The Committee considered the nature of the role, which would involve being an ambassador for Finito, providing occasional strategic advice, writing opinion and social media articles, and attending the annual Advisory Board dinner; some seminars; conferences; and other speaking events. The role would also likely include mentoring students wishing to take up a career in politics. This is a paid, part-time role, involving around 12 days a year.

The Committee noted that the role would not involve dealings with Government and that Ms Morgan had no official dealings with Finito or any of their competitors whilst in office. The Committee also took into consideration the Department's view, who had no concerns about the appointment.

The Committee noted that three months had passed since Ms Morgan's last day in ministerial office, and in accordance with the Government's Business Appointment Rules, advised that the appointment be subject to the following conditions:

- Ms Morgan should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) any privileged information available to her from her time in ministerial office; and
- for two years from her last day in ministerial office Ms Morgan should not become personally involved in lobbying the Government on behalf of Finito Education Limited (or its partners), or make use, directly or indirectly, of her contacts in Government and/ or Crown service to influence policy or secure funding on behalf of Finito Education Limited and its partners.

The [letter](#) containing the final advice was sent in November 2016, and Ms Morgan took up the appointment later that month.

REGISTRATION WITH STH MANAGEMENT LTD

Ms Morgan sought advice from the Committee about registering with STH Management Ltd, who would handle Ms Morgan's paid speaking engagements and selected media appearances in the UK and abroad.

The Committee took into account that the role would not involve dealings with Government and that Ms Morgan had no official dealings with STH Management Ltd or any of their competitors whilst in office. The Committee also sought the views of the Permanent Secretary for the Department for Education, who had no concerns.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- Ms Morgan should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) any privileged information available to her from her time in ministerial office; and
- for two years from her last day in ministerial office she should not become personally involved in lobbying the Government on behalf of STH Management Ltd or its clients.

The [letter](#) containing the final advice was sent in December 2016, and Ms Morgan registered the same month.

Alex Neil, Cabinet Secretary for Social Justice, Communities and Pensioner's Rights, Scottish Government

Alex Neil left his role as Cabinet Secretary for Social Justice, Communities and Pensioner's Rights in the Scottish Government in May 2016.

ADVISORY BOARD MEMBER, ETHX ENERGY

Mr Neil sought the Committee's advice about taking up a paid, part-time appointment as a member of the Advisory Board at Ethx Energy, an energy supply company. His role would not involve contact with Government.

When considering this application the Committee noted that Mr Neil had no dealings with the firm while in office and there is no formal relationship between the organisation and the Scottish Government.

The Committee also took into account that the Permanent Secretary to the Scottish Government had no concerns about this appointment. It was mindful that nearly six months had passed since he left ministerial office and relevant policy decisions that he would have been sighted on are now all in the public domain.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- He should not draw on any privileged information available to him as a Minister;
- For two years from his last day in ministerial office he should not become personally involved in lobbying the Scottish Government on behalf of Ethx Energy or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure funding on behalf of Ethx Energy.
- For 12 months from his last day of service he should not provide advice to Ethx Energy on bids or contracts it may make relating directly to the work of the Scottish Government.

The Committee wrote its [advice letter](#) to Mr Neil in October 2016 and he took up the role in December 2016.

Baroness Northover, Parliamentary Under Secretary of State, DFID

Baroness Northover left her role as Parliamentary Under Secretary of State, DFID, in May 2015.

MEMBER, WILTON PARK ADVISORY COUNCIL

Baroness Northover sought the Committee's advice about accepting a role as a member of Wilton Park Advisory Council.

Wilton Park is an executive agency of the Foreign and Commonwealth Office. It provides an international forum for strategic discussion, bringing together leading representatives from the worlds of politics, diplomacy, academia, business, civil society, the military and the media and focusing on issues of international security, prosperity and justice.

Baroness Northover explained that her role would be to attend conferences and to engage with the planning of future events. This is an unpaid position, likely to amount to 7 days' work per year.

When considering the application the Committee took into account that while the role may require some contact with Government it will not involve lobbying.

The Committee sought the opinion of Baroness Northover's former department, which did not have any concerns regarding the propriety of this appointment.

Taking into account the specific facts in this case in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- That she should not draw on (disclose or use for the benefit of yourself or the organisation to which this advice refers) any privileged information available to her as a Minister; and
- For two years from her last day in ministerial office, she should not become personally involved in lobbying the UK Government on behalf of Wilton Park.

The Committee wrote its [advice letter](#) to Baroness Northover in May 2016.

TRUSTEE, MALARIA CONSORTIUM

Baroness Northover sought advice from the Committee about taking up a role with Malaria Consortium.

In considering the application the Committee noted this was an unpaid, part time role with a charitable organisation, involving four days' work a year. The Committee also noted Baroness Northover had no official dealings with Malaria Consortium while in office; nor did she have responsibility for decisions on funding for malaria related charities.

The Committee took into account that the role was unlikely to involve contact with Government and that Baroness Northover's former department had no concerns about the appointment.

In accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- that Baroness Northover should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) any privileged information available to her from her time in Government; and
- for two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of Malaria Consortium, or make use, directly or indirectly, of her contacts in Government and/or Crown service to influence policy or secure funding on behalf of Malaria Consortium.

The letter containing the final [advice](#) was sent in November 2016, and she took up the appointment later that month.

Lord O'Neill, Commercial Secretary to the Treasury

Lord O'Neill left his position as Commercial Secretary to the Treasury in September 2016.

BOARD MEMBER, NORTHERN POWERHOUSE PARTNERSHIP

Lord O'Neill sought the Committee's advice about joining the Board of the Northern Powerhouse Partnership, a not-for-profit organisation created by George Osborne to promote economic development in the North of England.

The Committee noted that Lord O'Neill's role will be unpaid and will involve occasional presence at board meetings and possibly roundtable discussions. It also noted that he had responsibility for the Government's Northern Powerhouse project as Commercial Secretary to the Treasury.

When considering the application the Committee took into account that Lord O'Neill expected only to have contact with the Treasury and Government more broadly at the request of Government. It also took into account that his former Department had no concerns about the appointment.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advised Lord O'Neill that the appointment be subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him as a Minister; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the Northern Powerhouse Partnership, or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure funding on behalf of the Partnership.

The Committee sent its advice [letter](#) in November 2016 and he took up the role in the same month.

Rt Hon George Osborne MP, Chancellor of the Exchequer

Rt Hon George Osborne MP left his role as Chancellor of the Exchequer in July 2016.

PUBLIC SPEAKER, WASHINGTON SPEAKERS BUREAU

Mr Osborne sought the Committee's advice about registering with the Washington Speakers Bureau.

The Committee noted that Mr Osborne intends to make speeches on the current political environment.

When giving its advice the Committee took into account that HM Treasury had no concerns about Mr Osborne registering with the Washington Speakers Bureau and taking up employment as a public speaker. The Committee also

took into account that, as a former Cabinet Minister, Mr Osborne is subject to a standard three-month waiting period before taking up any outside appointment.

The Committee advised Mr Osborne that it could see no reason why he should not take up this appointment, subject to the following conditions:

- A three-month waiting period from his last day in Ministerial office;
- He should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time as a Minister and;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the Washington Speakers Bureau or its clients.

The Committee sent its [advice letter](#) to Mr Osborne in August 2016 and the appointment was announced that month.

CHAIR, NORTHERN POWERHOUSE PARTNERSHIP

Mr Osborne sought the Committee's advice about becoming Chair of the Northern Powerhouse Partnership (a part-time, unpaid role), which he launched on 16 September.

The Committee wrote to Mr Osborne and noted with concern that he sought advice on this appointment after the launch of the Northern Powerhouse Partnership. The Committee advised it is unable to offer retrospective advice on appointments that have already been announced.

The Committee noted that Mr Osborne's former Department and the Department for Communities and Local Government had no concerns about the appointment. It drew Mr Osborne's attention to the normal restriction it would impose prohibiting the misuse of privileged information obtained while in public office. It also noted that in seeking to promote economic development in the North of England, this role will involve some dealings with Government. However, it would expect Mr Osborne to refrain from making use, directly or indirectly, of privileged access derived from his role as a Minister to influence Government policy on behalf of the Northern Powerhouse Partnership.

The Committee also reminded Mr Osborne that advice should be sought on all appointments, paid or unpaid, before they are taken up or announced.

The [letter](#) containing the Committee's views was sent in October 2016.

ADVISOR, BLACKROCK INVESTMENT INSTITUTE

Mr Osborne sought the Committee's advice about taking up a role as an Advisor at Blackrock Investment Institute.

The Committee noted that Mr Osborne's role will involve speaking at client conferences and advising on developments in the global economy.

When giving its advice, the Committee noted that Mr Osborne had some contact with Blackrock to discuss the general economic situation and HM Treasury had confirmed that whilst he was responsible for general policy that would have affected the asset management industry, none of the decisions from his time in office were specific to Blackrock.

The Committee also took into account that Mr Osborne's contract would state he will not be involved in any work with the UK Government; almost seven months had passed since his time in office; and HM Treasury had no concerns about Mr Osborne taking up this appointment.

The Committee advised Mr Osborne that, in accordance with the Government's Business Appointment Rules, the appointment should be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time as a Minister and;
- for two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of Blackrock Investment Institute or any part of the Blackrock Group or its clients.

The Committee sent its advice [letter](#) to Mr Osborne in January 2017 and the appointment was announced in the same month.

KISSINGER FELLOW, MCCAIN INSTITUTE FOR INTERNATIONAL LEADERSHIP, UNIVERSITY OF ARIZONA

Mr Osborne sought the Committee's advice about taking up an appointment with the McCain Institute for International Leadership at the University of Arizona as a Kissinger Fellow.

The Committee noted that this part-time, paid role would involve giving lectures and participating in seminars.

When considering this application the Committee took into account that Mr Osborne had no contact with the University or any of its American competitors during his time in Government. It also took into account that the Permanent Secretary to the Treasury had no concerns about the appointment.

Taking into account the specific facts in this case in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- he should not draw on any privileged information available to him from his time in ministerial office; and

- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of the University.

The Committee wrote its [advice letter](#) to Mr Osborne in January 2017 and the role was announced later the same month.

Dr Daniel Poulter, Parliamentary Under-Secretary at the Department of Health

Dr Daniel Poulter MP left his role as Parliamentary Under-Secretary at the Department of Health in March 2015.

VISITING PROFESSOR, KING'S COLLEGE LONDON

Dr Poulter sought the Committee's advice on a role as a Visiting Professor at King's College London, based within the Faculty of Social Science and Public Policy.

When considering this application the Committee noted that Dr Poulter studied medicine at King's College, and the only dealings he had with the university while in ministerial office were when he gave a speech at a Veterans Health Conference hosted there. They also noted that the role will not involve any contact with the UK Government.

The Committee advised Dr Poulter that it could see no reason why he should not take up this appointment, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him as a Minister; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of King's College London, its students, staff or alumni.

The Committee wrote its [advice letter](#) to Dr Poulter in September 2016 and he took up the appointment in October 2016.

Dan Rogerson, Parliamentary Under Secretary of State in the Department for Environment, Food and Rural Affairs

Dan Rogerson left his role as Parliamentary Under Secretary of State in the Department for Environment, Food and Rural Affairs in May 2015.

NON-EXECUTIVE DIRECTOR, PLUMB PARTNERS GROUP

Mr Rogerson sought the Committee's advice about accepting a paid role as a Non-Executive Director at Plumb Partners Group, which consists of various companies that are involved in the importation, exportation, design, manufacture, sale and distribution of construction and home products such as underfloor heating and heating control systems.

When considering this application, the Committee took into account information provided by DEFRA, that it does not have a relationship with Plumb Partners Group and that Mr Rogerson had no official meetings with it while a Minister. It also took into account that this role will not include any lobbying or contact with Government. The Permanent Secretary of Mr Rogerson's former department was consulted and had no reservations about the appointment. The Committee was also mindful that 22 months had passed since he left Ministerial office.

The Committee advised, in accordance with the Government's Business Appointment Rules, that the appointment be subject to the following conditions:

- 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 as a Minister; and
- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of Plumb Partners Group or its subsidiaries or make use, directly or indirectly, of his contacts in Government to influence policy or secure business on their behalf.

The Committee wrote its [advice letter](#) to Mr Rogerson in March 2017 and the appointment has since been taken up.

Rt Hon Alex Salmond, First Minister of Scotland

Rt Hon Alex Salmond left his role as First Minister of Scotland in November 2014.

PRESENTER, LBC RADIO

Alex Salmond asked for the Committee's advice about accepting a contract to host a weekly 30-minute radio talk show on LBC.

When considering this application the Committee took into account that the Permanent Secretary in the Scottish Government had no concerns about this appointment.

The Committee advised that the appointment be subject to the following conditions:

- that he should not draw on any privileged information available to him as First Minister; and
- for two years from his last day in ministerial office, he should not become personally involved in lobbying the Scottish Government on behalf of LBC or its parent company, Global Radio plc.

The Committee wrote its [advice letter](#) to Mr Salmond in August 2016.

Mark Simmonds, Parliamentary Under-Secretary of State, Foreign and Commonwealth Office

Mark Simmonds left his role as Parliamentary Under-Secretary of State, Foreign and Commonwealth Office, in August 2014.

VICE PRESIDENT AND TRUSTEE, BRITISH INSTITUTE IN EASTERN AFRICA

Mr Simmonds sought advice about an unpaid role with the British Institute in Eastern Africa (BIEA), providing advice relating to research activities in the fields of archaeology, sociology and anthropology. When considering this application the Committee took into account Mr Simmonds's statement that he had no contact with the organisation or its competitors during his last two years in ministerial office, and had no access to commercially sensitive information about them. They further noted that this role would not involve contact with FCO or with Government more generally.

The Committee took into account the fact that a gap of nearly 21 months had already occurred since leaving ministerial office, and that FCO had no concerns about this role.

The Committee advised Mr Simmonds that it could see no reason why he should not take up this role, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him as a Minister; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of BIEA, its parent company, subsidiaries, partners or clients.

The Committee wrote its [advice letter](#) to Mr Simmonds in May 2016 and the appointment was taken up later that month.

STRATEGIC ADVISER, FARALLON CAPITAL

Mr Simmonds sought advice on a part time role as a Strategic Adviser to Farallon Capital, providing strategic economic, financial and political advice to the organisation.

When considering this application the Committee took into account Mr Simmonds's statement that he had no contact with the organisation or its competitors during his last two years in ministerial office, and had no access to commercially sensitive information about them. They further noted that this role would not involve contact with FCO or with Government more generally.

The Committee took into account the fact that a gap of nearly 21 months had already occurred since leaving ministerial office and that FCO had no concerns about this role.

The Committee advised Mr Simmonds that it could see no reason why he should not take up this role, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him as a Minister; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of Farallon Capital, its parent company, subsidiaries, partners or clients.

The Committee wrote its [advice letter](#) to Mr Simmonds in May 2016 and the appointment was taken up later that month.

Jo Swinson, Minister for Employment Relations and Consumer Affairs

Jo Swinson left her role as Minister for Employment Relations and Consumer Affairs in May 2015.

INDEPENDENT CONSULTANT

In the last reporting period Ms Swinson sought permission to set up as an independent consultant, to undertake work involving public speaking engagements as well as advising and delivering projects to assist organisations to improve their workplace culture and practices in order to unlock potential, especially from women and under-represented groups.

The Committee gave advice on the following commissions during the 2015-16 reporting period:

- [Eversheds and IPA \(June 2016\)](#)

- [University College London and InclusIQ \(October 2016\)](#)
- [Portland Communications \(October 2016\)](#)
- [Atlas Partners and Blueprint for Better Business \(January 2017\)](#)

Lord German recused himself from these cases.

ADVISORY BOARD MEMBER, RED TAPE INITIATIVE

Jo Swinson sought the Committee's advice about becoming a member of the advisory board of the Red Tape Initiative (RTI).

The Committee noted that the purpose of the RTI is to identify opportunities for repealing aspects of EU-derived regulation following the UK's decision to leave the EU. The RTI's proposals will be published for public debate and promoted on a non-partisan basis within Parliament. The role of the advisory board will be to provide views on what may be sensible and acceptable deregulatory measures. The role will be unpaid.

When considering the application, the Committee took into account that the Department for Business, Energy & Industrial Strategy had no concerns about the appointment.

Taking into account the specific facts in this case in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- she should not draw on any privileged information available to her from her time in ministerial office; and
- for two years from her last day in ministerial office, she should not become personally involved in lobbying the UK Government on behalf of the Red Tape Initiative.

The Committee sent its [advice letter](#) to Ms Swinson in December 2016 and the role was announced in April 2017.

Lord German recused himself from this case.

Sir Hugo Swire, Minister of State, FCO

Sir Hugo Swire left his role as Minister of State at FCO in July 2016.

SENIOR ADVISER, APIRO

Sir Hugo sought the Committee's advice about taking up a paid appointment as a member of the advisory board of Apero, an investment company.

When considering this application the Committee took into account that Sir Hugo had no official dealings with Apiro or their competitors whilst in office; had no access to any commercially sensitive information about their competitors; and that this role would not include any contact with Government. They also took into account that Sir Hugo's former department had no concerns about the appointment.

The Committee advised Sir Hugo 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 Government; and
- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of Apiro Capital or its clients.

The Committee wrote its [advice letter](#) to Sir Hugo in November 2016. He subsequently took up the appointment.

ADVISOR, KIS (FRANCE)

Sir Hugo sought the Committee's advice about taking up a paid, part-time appointment as an advisor to KIS (France), a manufacturer of photo booths and mini labs.

When considering this application the Committee noted that KIS (France) is a subsidiary of Photo-Me plc, which Sir Hugo was previously associated with when the Conservative Party was in opposition, as non-executive Chairman.

The Committee took into account that Sir Hugo's role with KIS is not likely to include any contact with Government and his former department raised no concerns about it.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- He should not draw on any privileged information available to him as a Minister; and
- For two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of KIS (France), its parent company Photo-Me plc or any other subsidiaries of the parent company.

The Committee wrote its [advice letter](#) to Sir Hugo in October 2016 and he took up the role in November.

DEPUTY CHAIRMAN OF THE COMMONWEALTH ENTERPRISE AND INVESTMENT COUNCIL (CWEIC)

Sir Hugo sought the Committee's advice about taking up a paid, part-time appointment as Deputy Chairman at CWEIC - an international organisation promoting trade between Commonwealth countries.

As Deputy Chairman, the role would include attending four Board meetings a year, conferences and other meetings related to CWEIC in order to promote their activities.

The Committee took into account that the role would not involve lobbying the UK Government and that Sir Hugo's former department, the FCO, has no objections to the appointment.

In accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of yourself or the organisation to which this advice refers) any privileged information available to him from his time in Government; and
- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of the Commonwealth Enterprise and Investment Council.

The Committee wrote its [advice letter](#) to Sir Hugo in November 2016 and he took up the role later that month.

Ed Vaizey, Minister of State for Digital and Culture

Ed Vaizey left his role as Minister of State for Digital and Culture in July 2016.

CONSULTANT, LIONTREE EUROPE

Mr Vaizey sought the Committee's advice about taking up a part-time, paid role as a consultant with LionTree Europe.

The Committee noted that Mr Vaizey would work with LionTree to understand emerging trends and developments in the UK and European technology, media and telecommunications sectors. This would involve hosting or attending seminars, events and conferences, as well as writing articles for LionTree publications. It would not involve any contact with his former Departments or with Government more generally.

When considering this application the Committee took into account that as Minister for Digital and Culture Mr Vaizey worked with the telecommunications, technology and media sectors and had occasional

meetings with city analysts from the banking sector to discuss telecommunications. He met LionTree three times this year on official business, in January, February and June.

The Committee consulted the Department for Culture Media and Sport and the Department for Business, Enterprise and Industrial Strategy about the appointment. They confirmed that Mr Vaizey had not been involved in any wider mergers and takeovers discussions that would have included commercially sensitive information that could give LionTree an advantage.

However, given that Mr Vaizey was involved in the development of Government policy on broadband and digital, the Committee considered that a three-month waiting period would be appropriate, before taking up this role.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- A three-month waiting period from his last day in Ministerial office;
- He should not draw on any privileged information available to him as a Minister;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of LionTree Europe or its parent company LionTree LLC.

The Committee wrote its [advice letter](#) to Mr Vaizey in September 2016 and he took up the role in December.

CHAIR OF ADVISORY BOARD, CREATIVE FUSE NORTH EAST

Ed Vaizey approached the Committee for advice about taking up an unpaid role as Chair of the Advisory Board of Creative Fuse North East (CFNE).

The Committee noted that CFNE is a research project, which will explore how the creative, digital and IT (CDIT) sector in the North East can be developed in order to play a leading role in the region's economy. It is funded by the Arts and Humanities Research Council (AHRC) and five universities (Newcastle, Northumbria, Durham, Sunderland and Teesside).

When considering this application the Committee was mindful that as Culture Minister Mr Vaizey had considerable engagement and involvement with the creative, digital and IT sector. It took into account that while the Department for Business, Enterprise and Industrial Strategy (BEIS) is the sponsor department for the Arts and Humanities Research Council, which funds CFNE, Mr Vaizey had no role in the decision to award funding to the project.

The Committee also took into consideration that Mr Vaizey expects to be involved with communicating the findings of the report produced by CFNE to Government, but that the research will be freely and publicly available to other

researchers and projects. The Committee consulted DCMS and BEIS, which had no concerns about the role.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises the appointment be subject to the following conditions:

- He should not draw on any privileged information available to him as a Minister;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of Creative Fuse North East or its partner organisations. This is not intended to prevent him reporting to Government on the activities of Creative Fuse North East but it would prevent him from making use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure funding on their behalf.

The Committee wrote its [advice letter](#) to Mr Vaizey in November 2016 and he took up the role in December.

CHAIRMAN OF THE ADVISORY BOARD, INTERNATIONAL eGAMES COMMITTEE; TRUSTEE, BRITDOC CHARITABLE TRUST; TRUSTEE, NATIONAL YOUTH THEATRE OF GREAT BRITAIN

Mr Vaizey sought the Committee's advice about positions with the International eGames Committee; BRITDOC Charitable Trust and National Youth Theatre of Great Britain (NYT).

When considering this application the Committee took into account that Government has no direct relationship with any of these organisations. It noted that while DCMS is supportive of the aims of the eGames Committee, it does not have a formal relationship with the Committee, and is not funding it or its activities. While NYT receives funding through the Arts Council England (an arms length body of DCMS) as one of their national portfolio organisations, and receives around £300k per annum, DCMS does not decide whether NYT should be funded or by how much.

The Committee consulted DCMS and the Department for Business, Enterprise and Industrial Strategy, which had no concerns about these appointments.

The Committee emphasised the lobbying ban set out below which precludes Mr Vaizey from directly approaching Government to influence policy or secure funding on behalf of these organisations.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the appointments be subject to the following conditions:

- He should not draw on any privileged information available to him as a Minister;
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the International eGames Committee; BRITDOC or the National Youth Theatre, or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure funding on behalf of these organisations.

The Committee wrote its [advice letter](#) to Mr Vaizey in October 2016. He took up the roles with BRITDOC and NYT in November and the role with the eGames Committee in January 2017.

MEMBER OF THE ADVISORY BOARD, THE SUNDAY TIMES SHORT STORY AWARD

Mr Vaizey sought the Committee's advice about taking up a part-time, unpaid position with The Sunday Times Short Story Award.

When considering this application the Committee took into account that as the Minister of State for Culture, Media and Sport, this appointment is related to the area for which Mr Vaizey had responsibility whilst in office, but that it had been eight months since he left his position. It also noted that Mr Vaizey stated he had no contact with the Sunday Times Short Story Award while in office, and that the role will not involve any contact with Government.

The Committee consulted DCMS and BEIS, who had no concerns about these appointments.

The Committee advised that, in accordance with the Government's Business Appointment Rules, this appointment be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him as a Minister; and
- for two years from his last day in Ministerial office, he should not become personally involved in lobbying the UK Government on behalf of the Sunday Times Short Story Award or make use, directly or indirectly, of his contacts in Government and/or Crown service to secure funding on behalf of the Sunday Times Short Story Award.

The Committee wrote its [advice letter](#) to Mr Vaizey in March 2017 and he took up this role in May.

Baroness Verma, Parliamentary Under Secretary of State, DFID

Baroness Verma left her role as Parliamentary Under Secretary of State, DFID, in July 2016.

DIRECTOR, DCS (UK) LTD

Baroness Verma sought advice on returning to a role as a Director of DCS (UK) Ltd, a social care provider, which is a family business of hers.

When considering this application the Committee noted that the role will involve no contact with her former department or Government more generally, that she had no dealings with DCS (UK) Ltd while in office, and that there is no relationship between the organisation and DFID. They also noted that DFID had no concerns and that this is a position she stood down from on becoming a Minister.

The Committee advised Baroness Verma that there was no reason why she should not take up this appointment, subject to the following conditions:

- She should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her as a Minister; and
- For two years from her last day in ministerial office she should not become personally involved in lobbying the UK Government on behalf of DCS (UK) Ltd.

The Committee wrote its [advice letter](#) to Baroness Verma in August 2016 and she took up the role in September 2016.

Theresa Villiers, Secretary of State for Northern Ireland

Theresa Villiers left her role as Secretary of State for Northern Ireland in July 2016.

ADVISORY BOARD MEMBER, RED TAPE INITIATIVE

Theresa Villiers sought the Committee's advice about becoming a member of the advisory board of the Red Tape Initiative (RTI).

The Committee noted that the purpose of the RTI is to identify opportunities for repealing aspects of EU-derived regulation following the UK's decision to leave the EU. The RTI's proposals will be published for public debate and promoted on a non-partisan basis within Parliament. The role of the advisory board will be to provide views on what may be sensible and acceptable deregulatory measures. The role will be unpaid.

When considering the application, the Committee took into account that Ms Villiers' former department had no concerns about the appointment.

Taking into account the specific facts in this case in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- she should not draw on any privileged information available to her from her time in ministerial office; and
- for two years from her last day in ministerial office, she should not become personally involved in lobbying the UK Government on behalf of the Red Tape Initiative.

The Committee sent its [advice letter](#) to Ms Villiers in November 2016 and the role was announced in April 2017.

Lord Wallace of Tankerness QC, Advocate General for Scotland and Deputy Leader of the House of Lords

Lord Wallace of Tankerness QC left his position as Advocate General for Scotland and Deputy Leader of the House of Lords in May 2015.

MEMBER AND CHAIR OF REGULATION BOARD, INSTITUTE OF
CHARTERED ACCOUNTANTS OF SCOTLAND

Lord Wallace asked for the Committee's advice about joining the Regulation Board of the Institute of Chartered Accountants of Scotland (ICAS). He would become Chair at the end of 2017.

The Committee noted this is a part-time, paid role, amounting to around 12 days of work a year. The Committee considered the contact Lord Wallace had with ICAS while in ministerial office, namely:

- he was a guest Speaker at ICAS' Grampian Region Annual Dinner (2013);
- he participated in the London Area Burns Supper (2014); and
- as part of the ministerial team at the Scotland Office, he had some informal meetings with ICAS members and officials in connection with the referendum on Scottish independence.

The Committee also took into consideration that Lord Wallace would not have contact with Government in his role as a member or Chair of the Regulation Board.

Taking into account the specific facts in this case in accordance with the Government's Business Appointment Rules, the Committee advised the appointment be subject to the following conditions:

- that he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him as a Minister; and
- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of ICAS or its members, or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure business on behalf of ICAS or its members.

The Committee wrote its [advice letter](#) to Lord Wallace in December 2016 and the role was taken up in March 2017.

Lord German recused himself from this application.

NON-EXECUTIVE DIRECTOR, THE WATER RETAIL COMPANY

Lord Wallace sought the Committee's advice about taking up an appointment as a non-executive director on the board of The Water Retail Company.

The Committee noted that this is a part-time role and will be unpaid initially, although it is likely to be remunerated at a later date.

When considering this application the Committee took into account that Lord Wallace had no dealings with his proposed employer, or the sector in which it will operate while in Government and that the role is not likely to include contact with Government. It was also mindful that the Director of the Office of the Advocate General had no concerns about him taking up this role.

Taking into account the specific facts in this case, the Committee advised that, in accordance with the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- that he should not draw on (disclose or use for the benefit of himself or the organisations or persons to which this advice refers) any privileged information available to him as a Minister; and
- for two years from his last day in ministerial office he should not become personally involved in lobbying the UK Government on behalf of The Water Retail Company.

The Committee wrote its [advice letter](#) to Lord Wallace in February 2017 and the role was taken up later that month.

Lord German recused himself from this application.

Baroness Warsi, Senior Minister of State, FCO and Minister for Faith and Communities, DCLG

Baroness Warsi left her role as Senior Minister of State at the FCO, and Minister for Faith and Communities, DCLG in August 2014.

ADVISER TO M&C SAATCHI WORLD SERVICES

Baroness Warsi asked for the Committee's advice about taking up a paid, part-time appointment as an Adviser to M&C Saatchi World Services.

The Committee took into account Baroness Warsi's assurance that the new role would not involve any lobbying of Government. Whilst the the Committee noted that both Baroness Warsi's former departments have a relationship with M&C Saatchi, both departments confirmed she had no involvement with the company while in post, and that they have no concerns about her taking up this appointment. The Committee also took into account that almost 21 months had passed since Baroness Warsi had left office.

The Committee advised that, under the Government's Business Appointment Rules, this appointment be subject to the following conditions:

- Baroness Warsi should not draw on any privileged information available to her as a Minister;
- for two years from her last day in ministerial office she should not contribute to any projects M&C Saatchi World Services undertakes for either FCO or DCLG; and
- for two years from her last day in ministerial office Baroness Warsi should not become personally involved in lobbying the UK Government, or use her Whitehall contacts to influence or secure business, on behalf of M&C Saatchi World Services, its parent company, subsidiaries or clients.

The Committee sent its [advice letter](#) to Baroness Warsi in April 2016.

Annex D – The Committee’s advice to former Crown servants

The Committee publishes its advice on all appointments it has considered, on an on-going basis, as and when they are either taken up or announced.

This annex contains summaries of the advice provided by the Committee during the reporting period.

Air Marshall Gregory Bagwell, Deputy Commander Operations, Air Command, MOD

Air Marshall Gregory Bagwell left his role as Deputy Commander Operations, Air Command at the MOD in May 2016. He left Crown service in December 2016.

INDEPENDENT CONSULTANCY

Air Marshal Bagwell sought advice on establishing an independent consultancy to provide general aerospace related advice, such as: assisting companies with delivering current contracts; providing horizon scanning about issues and risks for the future, based on his personal views rather than having knowledge of planned RAF requirements. He would not be involved in negotiating contracts themselves.

When considering this application, the Committee noted that Air Marshal Bagwell had spent his RAF career in operations and had never been involved in procurement. Although he had personal views on RAF requirements as a user he had never had any involvement in, or knowledge about, detailed plans on procurement. The Committee took into account the fact that the Countersigning Officer, Commercial Head and MOD panel raised no concerns about the new role, or the general aerospace consultancy, subject to conditions on lobbying and advising on bids or contracts relating to the MOD.

The Committee felt that although Air Marshal Bagwell had not been involved contracting and procurement, there was still a perception risk with him establishing an aerospace consultancy immediately after leaving Crown service, and that a waiting period should therefore apply. Given the time elapsed 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 in this case.

The Secretary of State for Defence accepted the Committee’s advice that, under the Business Appointment Rules, the consultancy be subject to the following conditions:

- a waiting period of six months from his last day in post (i.e. until 27 November 2016);
- that he should not draw on (disclose or use for the benefit of himself or the organisations 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 Crown service, he should not become personally involved in lobbying the UK Government on behalf of any of his clients or those he advises, nor should he make use, directly or indirectly, of his Government and/or Crown service contacts to influence policy or secure business on behalf of his clients;
- for 12 months from his last day of service he should not undertake any work as a consultant which 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; and
- for two years from his last day of service, before accepting any new commission he should make a case directly to the Committee to confirm that each individual commission he wishes to undertake would be consistent with the terms of the consultancy. (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).

The Committee provided its [advice](#) on this application in September 2016.

COMMISSIONS

Under his general aerospace related consultancy, Air Marshal Bagwell has since taken up commissions with:

- KPMG, the Committee's advice [letter](#) was sent in November 2016.
- Martin-Baker, the Committee's advice [letter](#) was sent in November 2016.
- QI Results, the Committee's advice [letter](#) was sent in December 2016.

Ann Beasley, Chief Finance and Commercial Officer, Ministry of Justice

Ann Beasley left her role as Chief Finance and Commercial Officer at the Ministry of Justice in September 2016

NON-EXECUTIVE DIRECTOR, BOARD OF ST GEORGE'S UNIVERSITY HOSPITAL FOUNDATION TRUST

Ms Beasley sought the Committee's advice about becoming a non-executive Director on the board of St George's University Hospital Foundation Trust (the Trust).

In considering this application, the Committee took into account that this is a part time, unpaid position and is not likely to include any contact or dealings

with Ms Beasley's former department or Government more generally. The Committee also noted that Ms Beasley had no dealings with the Trust nor did she have any access to any relevant commercially sensitive information while in office.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her from her time in Crown service; and
- for two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of the St George's University Hospital Foundation Trust.

The letter containing the final [advice letter](#) was sent in November 2016 and Ms Beasley took up the role later that month.

Richard Blakeway, Special Adviser, No.10

Richard Blakeway left his role as Special Adviser at No.10 in July 2016.

INDEPENDENT CONSULTANCY AND SUBSEQUENT COMMISSIONS

Richard Blakeway sought advice on establishing a consultancy service, providing strategic advice. He also sought permission to accept a commission with Willmott Residential.

Willmott Residential is a subsidiary of Willmott Dixon. The Committee took into account that Mr Blakeway had no dealings with the firm while he was a Special Adviser. The Committee noted that he did have some contact with the sector while in office, as he was present at two roundtable meetings: one with the British Property Federation on 22 June 2016, and one with the Home Builders Federation on 12 July 2016, which was organised by the Department for Communities and Local Government (DCLG).

The Committee considered the views of Mr Blakeway's former department, the Cabinet Office who noted the relatively short period of time he spent as a Special Adviser and they confirmed they had no concerns about the application. Due to the specific policy area involved, DCLG were also consulted and but raised no concerns.

The Permanent Secretary accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, this application 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 his clients or those he advises;
- for 12 months from his last day of service he should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of Cabinet Office; and
- once he has received approval to set up as an independent consultant, he must seek confirmation from the Committee directly that each subsequent individual commission is permissible under the terms of her 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 he will be expected to submit a fresh application.

The Committee issued its [advice](#) in October 2016 and he took up the new role and commission in November.

Since establishing the consultancy, he has taken up commissions with:

- [Barrat Developments PLC \(November 2016\)](#)
- [British Property Federation; Icen Projects; Jones Lang Lasalle \(January 2017\) and Policy Exchange \(April 2017\)](#)

Air Marshal Sir Simon Bollom, Chief of Materiel (Air), Defence Equipment and Support, MOD

Air Marshal Sir Simon Bollom left his position as Chief of Materiel (Air) (COM AIR) in Defence Equipment and Support, MOD, in April 2016.

INDEPENDENT CONSULTANT

Air Marshal Sir Simon Bollom sought advice on setting up an independent consultancy, offering general advisory work on business strategy, project management, and safety engineering with a particular emphasis on aviation. He also sought advice on accepting two commissions: an assignment with CH2M to conduct an independent review of the Highways England Major Projects transformation programme experience and five days consultancy with KPMG associated with Project Gateway, an Air Command project, which will provide a more efficient and effective delivery at RAF Brize Norton.

The Committee considered that given the seniority of Sir Simon's position in DE&S, it was appropriate to apply to his consultancy a two-year ban on working in the UK Defence market although the Committee would be

prepared to consider waiving the ban on a case-by-case basis if the specific circumstances of a commission warranted this approach.

When considering the commissions with CH2M and KPMG the Committee noted the factors set out in the attached letter. In relation to the commission with KPMG, the Committee took into account that this is a discrete piece of work, which is intended to find efficiencies and create value for the taxpayer and that KPMG have added a clause in their contract with Sir Simon to strictly limit the work he may undertake, to within Project Gateway. Further, whilst the MOD is not officially endorsing Sir Simon's assignment, it sees the value in the work Sir Simon will be doing with KPMG and has no concerns about him taking up the role. The Committee concluded that it would be appropriate to waive the ban on working in the UK Defence sector for the KPMG commission given the circumstances.

The Secretary of State for Defence accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, Sir Simon's independent consultancy and commissions with CH2M and KPMG be subject to the following conditions:

- For two years from his last day in post he should not provide advice on any supplier that he had dealings with as COM AIR;
- For two years from his last day in post he should not work in the UK Defence market (this condition does not apply to the commission with KPMG in the terms described in this advice);
- For two years 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;
- That 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, nor should he make use, directly or indirectly, of his Government and/or Crown service contacts to influence policy or secure business on behalf of his clients;
- For two years from his last day of Crown service, before accepting any new commission he should make a case directly to the Committee to confirm that each individual commission he wishes to undertake would be permissible under the approved terms of the consultancy; and
- Additionally, in relation to his work with KPMG, Sir Simon will be confined to working on project Gateway and will not attend KPMG meetings on any other work, support them in business development, or give presentations at internal knowledge-sharing events or similar.

The [letter](#) containing the final advice was sent in January 2017 and Sir Simon took up the commissions with CH2M and KPMG the same month.

Keith Bristow, Director General, National Crime Agency

Keith Bristow left his role as Director General, National Crime Agency in January 2016.

INDEPENDENT CONSULTANCY AND COMMISSIONS

Keith Bristow sought advice in the last reporting period about setting up an independent consultancy offering a range of advisory and consultancy services, including: leadership and management development; risk and reputation management; governance and standards; and law enforcement, security and policing.

During the 2015-16 reporting period, the Committee has advised on the following commissions under his consultancy:

- [Chair, Cyber Crime Advisory Panel, Lloyds Banking Group](#)
- [Member, BT Group National Security Committee and Adviser to BT Security Enterprise Division](#)
- [Special Advisor, Digital Barriers Services Limited](#)
- [Vice Chairman, Arcanum Global](#)

Mary Calam, Director General, Crime and Policing Group, Home Office

Mary Calam left her role as Director General, Crime and Policing Group, Home Office in June 2016.

SENIOR EXPERT, MCKINSEY & COMPANY

Ms Calam sought the Committee's advice about taking up an appointment as a Senior Expert with McKinsey & Company.

When it considered this application the Committee took into account that while Ms Calam has had some official dealings with McKinsey and other companies in this sector, there has been no commercial element and she has not been involved in any decisions affecting them. She has no access to information that could be regarded as commercially valuable or sensitive. The Committee further took into account that the Home Office has no reservations about the propriety of this appointment.

McKinsey has given an undertaking that it will ensure that Ms Calam is not required to act in a way which is incompatible with the Business Appointment Rules in any project in which she is involved.

The Prime Minister accepted that Committee's advice that there was no reason why she should not take up this appointment, subject to the conditions that:

- She should not draw on any privileged information available to her from her time in Crown service;
- For two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of McKinsey and Company, its subsidiaries or clients or use her Whitehall contacts to influence policy or secure business on behalf of McKinsey and Company, its subsidiaries or clients;
- For 12 months from her last day of Crown service she should not provide advice on bids or contracts relating to the Home Office; on McKinsey client matters upon which she has been directly involved while in Crown service; or with regard to the formulation by any government of policy in the areas of crime, policing or national security.

Sir Alex Allan recused himself from this case.

The [letter](#) containing the final advice was sent in April 2016 and Ms Calam commenced the role in June 2016.

Richard Calvert, Director General, Strategy and Resources, Department for Education

Richard Calvert left his role as Director General of Strategy and Resources at the Department for Education in October 2016.

CHIEF OPERATING OFFICER, SHEFFIELD HALLAM UNIVERSITY

Mr Calvert asked for the Committee's advice about taking up the post of Chief Operating Officer at Sheffield Hallam University.

The Committee wrote to the Department registering its concern that Mr Calvert's role was announced before the Committee had had the opportunity to offer its advice. The Committee was therefore unwilling to give retrospective advice for this appointment.

However, the Committee would like to put in the public domain that:

- Mr Calvert has informed the Committee that, in his role as Chief Operating Officer at Sheffield Hallam University, he will lead on professional services within the University.
- The Permanent Secretary at the Department for Education had confirmed that Mr Calvert was not involved in taking decisions on higher education whilst he was at the Department.
- Mr Calvert has confirmed he was appointed following an open application process.
- Mr Calvert told the Committee that whilst the new role may involve some contact with higher education regulatory bodies (such as the new Office for

Students), his role was unlikely to involve any contact that would amount to lobbying, or any other direct engagement with his former department.

The Committee's [letter](#), sent in March 2017, also drew Mr Calvert's attention to the normal restrictions it imposes, including a two year lobbying ban, and the prohibition on using privileged information obtained while in public office.

Peter Carroll, Special Adviser, HM Treasury

Peter Carroll left his role as a Special Adviser in HM Treasury in April 2015.

INDEPENDENT CONSULTANCY

Peter Carroll sought advice in the last reporting period about establishing a consultancy service, Tendo, providing general consultancy on how to communicate with government and how to deliver public affairs and public engagement strategies.

During the 2015-16 reporting period, the Committee has advised on the following commission under his consultancy:

COMMISSION WITH ASSOCIATION OF BRITISH INSURERS

Mr Carroll sought advice on accepting a commission to deliver a short presentation to the Association of British Insurers (ABI) on campaigning techniques.

The Committee noted his assurance that the planned presentation will be based almost entirely on his experience of campaigning (on the FairFuelUK campaign and the Gurkha Justice Campaign) prior to entering Crown service.

Mr Carroll sought advice jointly with Will de Peyer, a fellow former Special Adviser.

The Committee agreed that this commission was permissible within the terms of Mr Carroll's original consultancy, and should be subject to the conditions imposed on that consultancy.

The [letter](#) containing the Committee's advice was sent in April 2016 and the commission was taken up later that month.

Dr Will Cavendish, DG for Innovation, Growth and Technology, Department of Health

Dr Will Cavendish left his role as DG for Innovation, Growth and Technology, Department of Health, in February 2016. Between February and September 2016 he was seconded to the Cabinet Office to lead short-term projects.

DIRECTOR OF STRATEGY, GOOGLE DEEPMIND

Dr Cavendish sought the Committee's advice on taking up an appointment as Director of Strategy at Google DeepMind (GDM), a technology company in the field of artificial intelligence.

When considering this application the Committee noted that Dr Cavendish has not had any direct contractual dealings with GDM or its parent company, Alphabet, or held any meetings with them. It took into account that as DG Innovation, Growth and Technology (IGT) in the Department of Health (DH), he met twice with Verily, a separate sub-organisation of Alphabet, to discuss their work on new health technologies such as digital contact lenses and digital diabetes monitoring. Dr Cavendish was also involved in contractual dealings with a group of organisations that included Google Life Sciences (now Verily) as part of the NHS Test Beds programme. This competition was run by Innovate UK in accordance with their rules for fair and open competition and the contracts will be formally let by NHS England, not DH.

When considering this application the Committee took into account that DH had no reservations about the appointment given the six-month period between Dr Cavendish leaving his role in DH and his start at GDM. The Committee considered that had Dr Cavendish been looking to move directly from DH to GDM, a waiting period of up to six months would have been appropriate.

The Prime Minister accepted the Committee's advice that there was no reason why Dr Cavendish should not take up this appointment, subject to the following conditions:

- For 12 months from his last day of service he should not provide advice to Google DeepMind on the terms of a bid or contract relating directly to the work of the Department of Health;
- He should not draw on any privileged information available to him from his time in Crown service; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of Google DeepMind, its subsidiaries or Alphabet, its parent company.

The [letter](#) containing the final advice was sent in September 2016 and the appointment was taken up in October.

Natalie Ceeney, CEO of HM Courts and Tribunal Service

Natalie Ceeney left her role as CEO of HM Courts and Tribunal Service in May 2016.

INDEPENDENT CONSULTANCY

Ms Ceeney sought the Committee's advice about establishing an independent consultancy specialising in business transformation, regulatory compliance in financial services and alternative dispute resolution.

Ms Ceeney has confirmed that her consultancy will not offer any government lobbying services, nor will it offer sales strategies into government. She has undertaken not to engage in any activity involving advising on justice policy as it relates to the courts. She has also provided an assurance that she will not broker any introductions between anyone outside of government and any government policy makers or ministers.

When considering this application the Committee took into account that the Permanent Secretary for the MoJ expressed no concerns in principle about Ms Ceeney establishing an independent consultancy.

The Prime Minister accepted the Committee's recommendation that there was no reason why Ms Ceeney should not establish this consultancy, subject to the conditions that:

- She should not draw on (disclose or use for the benefit of herself or the organisations to which this advice refers) any privileged information available to her from her time in Crown service;
- For two years from her last day in Crown service, she should not become personally involved in lobbying the UK Government on behalf of any of her clients or those she advises or make use, directly or indirectly, of her contacts in Government and/or Crown service to influence policy or secure business;
- For 12 months from her last day of service she should not undertake any work as a consultant which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of HM Courts and Tribunal Service or the Ministry of Justice; and
- For two years from her last day in Crown service, she should not provide advice on matters on which she was directly involved while in Crown service or with regard to justice policy as it relates to the courts.

The [letter](#) containing the final advice was sent in August 2016 and Ms Ceeney started taking on commissions under her consultancy in September.

Bill Crothers, Government Chief Commercial Officer, Cabinet Office

Bill Crothers left his position as Government Chief Commercial Officer, Cabinet Office, in November 2015.

INDEPENDENT CONSULTANT

Mr Crothers sought the Committee's advice about forming an independent consultancy offering advisory services providing general business advice, typically in areas such as governance, strategy, procurement, sales and technology. His first commission would be to work as a subcontractor to Francis Maude Associates (FMA) through which he would provide procurement and commercial advice to help FMA advise overseas governments on how to improve the way they buy services and products and/or to manage contracts better. His initial assignment would involve working with the Australian government and would last one week.

When considering this application, the Committee took into account that Mr Crothers' former department had no concerns about him setting up a consultancy and working with FMA in the manner described. They also noted that 12 months had passed since he held the post of Chief Commercial Officer.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, the consultancy and commission with FMA be subject to the following conditions:

- he should not draw on privileged information available to him from his time in Crown service;
- for two years from his last day in service, Mr Crothers should not become personally involved in lobbying the UK Government on behalf of any of his clients or those he advises or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure business on behalf of any of his clients or those he advises;
- 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 his work through Francis Maude Associates (FMA) change or expand in such a way that it falls outside the terms set out in this advice, Mr Crothers should return to the Committee for advice on that particular piece of work.

The Committee wrote its [advice letter](#) to Mr Crothers in December 2016.

Mr Crothers took up a commission with [Green Park](#) under the terms of his consultancy in February 2017.

ADVISER, SALESFORCE.COM

Mr Crothers sought the Committee's advice about taking up a new role as an adviser to the leadership team of Salesforce.com, a technology services company with headquarters in San Francisco.

When considering this application the Committee took into account the views of the Cabinet Office, which believed that Mr Crothers did not have access to any information that would give Salesforce an unfair advantage, and confirmed that the particular area Salesforce operates in was not within Mr Crothers' policy remit while in office.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, this appointment be subject to the following conditions:

- he should not draw on privileged information available to him from his time in Crown service;
- for 12 months from his last day in service, he should not provide advice on bids/contracts relating to the UK Government; and
- For two years from his last day in service, Mr Crothers should not become personally involved in lobbying the UK Government on behalf of Salesforce or make use, directly or indirectly, of his Government and/or Crown service contacts to influence policy or secure business on behalf of Salesforce.

The Committee wrote its [advice letter](#) to Mr Crothers in June 2016 and he took up the appointment in September 2016.

Richard Davies, Special Adviser

Richard Davies left his role as Special Adviser in July 2016.

CHIEF OF STAFF, LONDON SCHOOL OF ECONOMICS GROWTH
COMMISSION

Richard Davies sought the Committee's advice about accepting an appointment as Chief of Staff at the London School of Economics (LSE) Growth Commission.

When considering this application the Committee was mindful that Mr Davies is an economist by profession. The Committee took into account that there is very limited overlap between the policy areas that Mr Davies was working on while at HM Treasury and his proposed new role. Furthermore, any relevant, sensitive government information that he had access to in his capacity as Special Adviser on the economy will become quickly out-dated.

The Committee noted that Mr Davies' former department had no concerns about the propriety of the appointment.

The Committee advised that it saw no reason why he should not take up this appointment, subject to the 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; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the London School of Economics or the University of London.

The [letter](#) containing the final advice was sent in August 2016 and Mr Davies took up the role in September 2016.

Sir Jon Day, Chair of the Joint Intelligence Committee

Sir Jon Day left his role as Chair of the Joint Intelligence Committee in January 2016.

DIRECTOR, SOUTHAMPTON UNIVERSITY CENTRE FOR HOMELAND SECURITY; SPECIAL ADVISOR, CREDIT AGRICOLE; TRUSTEE, THE BATTLEFIELDS TRUST

Sir Jon Day sought the Committee's advice about the following three appointments:

Director, Southampton University Centre for Homeland Security

The aim of the Centre is to work in partnership with Government, the private sector and academia to break down boundaries and build practical cooperation. The focus on cyber, resilience and other aspects of homeland security is in line with HMG's priorities and will add to the UK's attractiveness as a partner at home and abroad.

The Committee noted that this is a paid role, involving three days' work per week.

Special Advisor, Credit Agricole

Sir Jon has been invited to become a senior defence and security expert to provide objective advice on the international context of Credit Agricole's business. This post is paid and will involve two days' work per month.

The Committee noted that Sir Jon had no prior official contact with the company. It also noted that Sir Jon has incorporated into his contract the following three terms (the second and third terms are not time dependent):

- “I will not be asked to become personally involved in lobbying the UK on behalf of Credit Agricole or its clients until two years after my last day of Crown service on 15 January 2016.
- I will not draw on, disclose or use privileged information made available to me as a Crown servant.
- I may exempt myself from any area of the bank’s business where I judge my role would run directly counter to the UK’s national security interests.”

Trustee, The Battlefields Trust

This is an unpaid position as a trustee with The Battlefields Trust, which seeks to protect historic battlefield sites in England.

The Committee noted that this role would not include any contact or dealings with Government.

When considering the application for the roles described above, the Committee took into account that the Cabinet Office has no reservations about any of these appointments and is supportive of the role with Southampton University, which it considers to be in the public interest. It was also mindful that Sir Jon would not take up these appointments until mid January 2017, one year after his departure from the Civil Service.

Outcome

The Prime Minister accepted the Committee’s advice that, in accordance with the Government’s Business Appointment Rules, these appointments be subject to the following conditions:

- He should not draw on privileged information available to him from his time in Crown service; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of Credit Agricole; Southampton University Centre for Homeland Security or The Battlefields Trust or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy; or secure business or funding on behalf of these organisations. This does not preclude routine contact on matters aligned with Government policy relating to the role with Southampton University.

The [letter](#) containing the final advice was sent in January 2017. Sir Jon took up the appointments with Southampton University and the Battlefields Trust the same month and the appointment with Credit Agricole in February 2017.

Will de Peyer, Special Adviser, HM Treasury

Will de Peyer left his role as a Special Adviser in HM Treasury in April 2015.

INDEPENDENT CONSULTANCY

William de Peyer sought advice in the last reporting period on establishing a consultancy service, Tendo, providing general consultancy on how to communicate with government and how to deliver public affairs and public engagement strategies.

During the 2015-16 reporting period, the Committee advised on the following commission under his consultancy:

COMMISSION WITH ASSOCIATION OF BRITISH INSURERS

Mr de Peyer sought advice on accepting a commission to deliver a short presentation to the Association of British Insurers (ABI) on campaigning techniques.

The Committee noted his assurance that the planned presentation will be based almost entirely on his business partner Mr Carroll's experience of campaigning (on the FairFuelUK campaign and the Gurkha Justice Campaign) prior to entering Crown service.

Mr de Peyer sought advice jointly with Peter Carroll, a fellow former Special Adviser.

The Committee agreed that this commission was permissible within the terms of Mr de Peyer's original consultancy, and should be subject to the conditions imposed on that consultancy.

The [letter](#) containing the Committee's advice was sent in April 2016 and the commission was taken up later that month.

Mark Dearnley, Chief Digital & Information Officer at HM Revenue & Customs

Mark Dearnley left his role as Chief Digital & Information Officer at HM Revenue & Customs in September 2016.

CHIEF INFORMATION OFFICER – TECHNOLOGY LEADERSHIP, PREMIUM CREDIT LTD

Mr Dearnley sought advice on taking up a full-time, paid appointment as Chief Information Officer – Technology Leadership, at Premium Credit Ltd.

When considering this application the Committee took into account that the role will not include any contact or dealings with Mr Dearnley's former department or government more generally. It also noted that he had not personally had any direct contractual dealings with his prospective employer over his last two years of service and was not responsible for anyone who did. Neither had he been involved in the development or administration of any departmental policy or in policy or regulatory work that has affected or could affect his prospective employer or its competitors.

The Committee sought the views of the Permanent Secretary for HMRC who raised no concerns about the propriety of the appointment.

The Prime Minister accepted the Committee's advice that there was no reason why Mr Dearnley should not take up this position, subject to the following conditions:

- That he should not draw on (disclose or use for the benefit of himself or the organisations 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 Crown service, he should not become personally involved in lobbying the UK Government on behalf of Premium Credit Ltd, its clients or its parent company.

The [letter](#) containing the final advice was sent in August 2016 and the appointment was taken up in October.

Oliver Dowden, special adviser to the Prime Minister

Oliver Dowden left his role as special adviser to the Prime Minister in October 2014.

TRUSTEE, LAW FAMILY EDUCATION TRUST

Mr Dowden sought advice on accepting an unpaid appointment as a trustee of the Law Family Education Trust, a charitable trust providing support to children and young people within the schools and academies run by the Laurus Trust.

When considering this application the Committee took into account that Mr Dowden's role would be unpaid, involve attending three to four meetings per year, and would not include any dealings with his former department or with the Government more generally.

The Committee noted that Mr Dowden had no dealings with the organisation while in post as a special adviser. They took into account that, while in office, Mr Dowden advised the Prime Minister on education policy in general, among a range of many other issues, but he was not involved in formulating any policy that would specifically impact this charitable trust.

The Permanent Secretary accepted the Committee's advice that there was no reason why Mr Dowden should not take up this appointment, subject to the following conditions:

- 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; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the Law Family Education Trust or the Laurus Trust.

The [letter](#) containing the Committee's advice was sent in June 2016 and the appointment was taken up in July 2016.

Lt Gen Timothy Evans, Commander, Allied Rapid Reaction Corps (COMARRC), MOD

Lt Gen Timothy Evans left his position as Commander, Allied Rapid Reaction Corps (COMARRC) in July 2016.

SENIOR NATO MENTOR, MEMBER OF DEFENCE CORRUPTION MONITORING COMMITTEE, TRANSPARENCY INTERNATIONAL, INDEPENDENT CONSULTANCY AND COMMISSIONS

Lt Gen Evans sought the Committee's advice about becoming a Senior NATO Mentor and member of Transparency International's Defence Corruption Monitoring Committee. He also proposed to set up an independent consultancy and take on commissions with Strategia Worldwide Ltd and Adjuvo.

As a NATO Senior Mentor, Lt Gen Evans would be expected to provide guidance and assistance to NATO High Readiness Force Commanders on courses and exercises in support of the Supreme Allied Commander Europe. This would involve approximately 45 days per annum and starts in January 2017.

Lt Gen Evans had also been asked to join the Defence Corruption Monitoring Committee (DCMC), which is being established by the Transparency International Defence and Security Programme to support the Ukrainian MOD's progress towards anti-corruption aims. His involvement is both supported by UK MOD and HMG funded. Initially it will require him to attend 2-3 workshops to establish the programme and then quarterly meetings.

The Committee noted that Lt Gen Evans also proposed to set up an independent consultancy, focusing on defence, security, risk management and resilience, counter-terrorism, training, leadership and mentoring.

Under his consultancy, Lt Gen Evans plans to become an associate with Strategia Worldwide Ltd, which specialises in the management of corporate risk using analysis and campaign design and delivery technology.

He may also take on work with Adjuvo, a small private equity company that invests in private companies, usually small start-up firms. He may be asked to provide specific advice or assistance under the terms of his consultancy.

When considering this application the Committee took into account that the MOD panel expressed no concerns about these appointments, subject to a 2-year lobbying ban and a 12-month restriction on providing advice on the terms of any bid or contract relating to the work of the MOD.

The Committee considered Lt Gen Evans' seniority and the fact that his consultancy would cover areas closely linked to his most recent roles in the MOD, made it appropriate to impose a gap between him leaving the MOD and setting up an independent consultancy.

The Secretary of State for Defence accepted the Committee's advice that these appointments be subject to the following conditions:

- a six-month waiting period from his last day in post (in respect of his consultancy only);
- that he should not draw on (disclose or use for the benefit of himself or the organisations 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 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 which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the MOD and its Trading Funds; and
- for two years from his last day of service, before accepting any new commission he should apply to the Committee. 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).

The [letter](#) containing the final decision was sent in October 2016. The appointments and consultancy were subsequently taken up.

Baroness Fall, Deputy Chief of Staff to the Prime Minister

Baroness Fall left her role as Deputy Chief of Staff to the Prime Minister in July 2016.

TRUSTEE, ATLANTIC PARTNERSHIP

Baroness Fall sought the Committee's advice about becoming a trustee with Atlantic Partnership (AP).

When considering the application the Committee noted that Baroness Fall was a founding director of the charity 15 years ago and has now been asked to join AP as a trustee. She would attend board meetings two to three times a year and assist the organisation by giving general advice. This is an unpaid role.

The Committee noted that Baroness Fall did not have any dealings with AP while in office and that her former Department raised no concerns about her taking up the role. The Committee also noted the role may include some contact with Government as the Chairman of AP occasionally invites members of the UK and European Governments to speak at events.

The Permanent Secretary of the Cabinet Office accepted the Committee's advice that the appointment be subject to the following conditions:

- that she should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) any privileged information available to her from her time in Crown service; and
- for two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of the Atlantic Partnership.

The [letter](#) containing the Committee's advice was sent in April 2017.

SENIOR ADVISOR, BRUNSWICK GROUP LLP

Baroness Fall sought the Committee's advice on accepting a part-time, paid role as a senior advisor at Brunswick Group LLP, a global corporate communications firm.

The Committee noted that Baroness Fall's role would be to provide strategic advice to the Chairman and to assist him with recruitment to the company.

When considering this application, the Committee took into account Baroness Fall's assurance that her role would not involve lobbying; and neither will she have contact or dealings with Government more generally. It also noted that she had no official contact with Brunswick while she was in office, no official dealings with its competitors or the sector in which they operate and no access to any commercially sensitive information about any of its competitors. The Committee also noted that Baroness Fall's former department had no propriety concerns about this appointment.

The Permanent Secretary accepted the Committee's advice that the appointment be subject to the following conditions:

- That she should not draw on any privileged information available to her from her time in Crown service;
- For two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of Brunswick Group LLP or its clients.

The [letter](#) containing the final advice was sent in November 2016 and Baroness Fall took up the appointment that month.

Professor Vernon Gibson, Chief Scientific Adviser, Ministry of Defence

Professor Vernon Gibson left his role as Chief Scientific Adviser at the Ministry of Defence in June 2016.

PRESIDENT'S ENVOY, IMPERIAL COLLEGE LONDON

Professor Vernon Gibson sought advice on taking up a paid, part-time position as President's envoy at Imperial College London.

When considering this application the Committee took into account that neither Professor Gibson nor those whom he was responsible for over the last two years of service had any official dealings with the University, contractual or otherwise. Neither has he been involved in any policy decisions that have affected or could affect his proposed employer or its competitors.

The Committee took into account that the MOD Business Appointments Panel expressed no concerns about Professor Gibson taking up this position, subject to a two-year lobbying ban. The Committee noted that the role would not require him to have any dealings with Government.

The Secretary of State for Defence accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules the appointment be subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time in Crown service; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of Imperial College London or its students.

The [letter](#) containing the final advice was sent in November 2016 and the role was taken up in April 2017.

TECHNOLOGY ADVISORY COUNCIL MEMBER, BP PLC; SENIOR FELLOW,
HARVARD KENNEDY SCHOOL OF GOVERNMENT

Professor Vernon Gibson sought advice on taking up an appointment as a paid member of the Technology Advisory Council at BP PLC and becoming an unpaid non-residential Senior Fellow at the Harvard Kennedy School of Government.

When considering this application the Committee took into account that neither he nor those whom he was responsible for over the last 2 years of service have dealt with the receipt of tenders or awarding of contracts, nor administered or advised on contracts between either of his prospective employers and the MOD.

The Committee also took into account that neither position would require Professor Gibson to advise on matters relating to defence or to have any dealings with government. It is also of note that the position with BP will see him returning to the company he worked for before taking up the post of Chief Scientific Advisor at MOD.

The Secretary of State for Defence accepted the Committee's advice that there was no reason why Professor Gibson should not take up these appointments, subject to the following conditions:

- He should not draw on any privileged information available to him from his time in Crown service; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of BP PLC or its subsidiaries or the Harvard Kennedy School of Government.

The [letter](#) containing the final advice was sent in July 2016 and the appointment was taken up in October.

DISTINGUISHED PROFESSOR AND VICE-CHANCELLOR'S SENIOR
FELLOW, UNIVERSITY OF SHEFFIELD

Professor Vernon Gibson sought advice on taking up a paid, part-time position at the University of Sheffield.

When considering this application the Committee took into account that he had no official dealings with the University during his last two years of service and that the role would not require him to have any dealings with government.

The Secretary of State for Defence accepted the Committee's advice that there was no reason why Professor Gibson should not take up this appointment, subject to the following conditions:

- He should not draw on any privileged information available to him from his time in Crown service; and

- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the University of Sheffield or its students.

The [letter](#) containing the final advice was sent in September 2016 and the appointment was taken up in October.

Ameetpal Gill, Director of Strategy, No.10

Ameetpal Gill left his role as Director of Strategy at No.10 in July 2016.

INDEPENDENT CONSULTANCY

Ameetpal Gill asked for the Committee's advice about forming an independent consultancy. His consultancy will offer companies, interest groups and charities strategic, campaigns and policy advice.

The Committee wrote to the Permanent Secretary at the Cabinet Office registering its concern that Mr Gill's consultancy and the fact that it had already secured clients was announced before the Committee had had the opportunity to offer its advice.

The Committee emphasised that it expects Mr Gill to seek advice from the Committee in relation to each individual commission before taking it up, as is standard practice for former Crown servants who have set up consultancies following the correct process under the Business Appointment Rules. The Committee will consider each individual commission afresh, on its merits, under the Rules.

The [letter](#) containing the Committee's views was sent in September 2016.

COMMISSIONS

Following the establishment of Mr Gill's independent consultancy, Hanbury Strategy and Communications Ltd, Mr Gill sought advice about commissions with the following companies:

- GlaxoSmithKline plc (GSK)
- Deliveroo (Roofoods Ltd)
- Linklaters LLP
- Herbert Smith Freehills

John Wood recused himself from these cases.

The Committee's [advice letter](#) was sent in March 2017 and the commissions were announced in April 2017.

Sir Bernard Gray, Chief of Defence Materiel

Sir Bernard Gray left his role as Chief of Defence Materiel in November 2015.

COMMISSIONS WITH MCKINSEY & COMPANY AND IMMEDIATE MEDIA COMPANY

Sir Bernard Gray sought the Committee's advice about taking up commissions with McKinsey & Company and Immediate Media Company.

The Committee noted that Sir Bernard had set up a consultancy called Pole Star Strategy in December 2015 which he described as; "providing senior management advice to private sector organisations and foreign friendly governments in matters such as corporate direction and strategy, negotiating skills, corporate transformation, financial reconstruction and capital change, business recovery and turnaround skills." The Committee was not approached for advice and was unwilling to give retrospective approval for the establishment of Pole Star Strategy or his subsequent contract with the MoD.

When considering the commission with McKinsey & Company, the Committee took into account a number of factors, which are listed in the advice letter, including that the commission is based overseas and will involve working with the US Army to review their procurement processes; that the UK Government is supportive of this work and that Sir Bernard had no intention of working in the UK defence sector.

The Committee also noted that Sir Bernard had no contractual dealings with Immediate Media during his last two years of service, did not advise on any related contracts, and had no involvement in any decisions or policies that could have affected the company or its competitors.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the commissions be subject to the following conditions:

- A waiting period of nine-months from his last day of Crown service;
- For two years from his last day in service he should not work for McKinsey & Company in the UK Defence market;
- For two years from his last day of service he should not provide advice to McKinsey & Company or its clients on the terms of a bid or contract relating directly to the work of the Ministry of Defence;
- He should not draw on any privileged information available to him from his time in Crown service; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the organisations to which this advice refers or their subsidiaries or clients.

The Committee would expect Sir Bernard to seek further advice if he proposes to extend or otherwise change the nature of his commission with McKinsey & Company and in relation to any new commissions (including new commissions with McKinsey & Company), before taking them up.

The Committee wrote its [advice letter](#) to Sir Bernard in November 2016 and he took up the commissions later that month.

COMMISSION WITH MCKINSEY & COMPANY

Sir Bernard Gray sought the Committee's advice about taking up a further commission with McKinsey & Company under his independent consultancy.

The Committee noted that the commission is based overseas and will involve working as part of a team to review the readiness of the Netherlands Armed Forces with a view to improving the availability of its military for operations. When considering the application, the Committee took into account that the UK Government is supportive of this work and ten months had passed since his last day in Crown service.

Taking into account the specific facts in this case, in accordance with the Government's Business Appointment Rules, the Committee advised the commission be subject to the following conditions:

- For two years from his last day in service he should not work for McKinsey & Company in the UK Defence market;
- For two years from his last day of service he should not provide advice to McKinsey & Company or its clients on the terms of a bid or contract relating directly to the work of the Ministry of Defence;
- He should not draw on any privileged information available to him from his time in Crown service; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the organisations to which this advice refers or their subsidiaries or clients.

The Committee wrote its [advice letter](#) to Sir Bernard in November 2016 and he took up the commission later that month.

Lt Gen Sir Andrew Gregory, Ministry of Defence

Lt Gen Sir Andrew Gregory left the Ministry of Defence in August 2016.

CONTROLLER/ CHIEF EXECUTIVE OF SSAFA

Sir Andrew Gregory asked for the Committee's advice about an appointment with SSAFA, the national Armed Forces charity, which was submitted after his appointment had been publicly announced.

The Committee wrote to the Permanent Secretary at the Ministry of Defence registering its concern about the timing of the application. The Committee noted that the Business Appointment Rules specify that retrospective applications will not normally be accepted. To fulfil the remit given to it by Government the Committee needs to be able to consider an application fully and freely before offering its advice. This is impossible to do in a way that will command public confidence if an appointment has already been announced and/or taken up. Therefore, the Committee was unwilling to give retrospective approval for the appointment.

However the Committee formally recorded that:

- This is a full-time, paid role, which Sir Andrew was offered following an open application process.
- The appointment will include contact with Government, as Sir Andrew will be required to liaise with Ministers and officials in MOD, the Cabinet Office and other Whitehall departments to deliver the intent behind Government's Armed Forces Covenant.
- SSAFA delivers contracted healthcare and social services to parts of the MOD but Sir Andrew had no contractual dealings with SSAFA while in post. He had monthly discussions with the previous Controller, as he did with the Chief Executives of other major military charities, in order to improve the support to the Armed Forces Community.
- The MOD would expect Sir Andrew to refrain from becoming directly involved in contractual negotiations with the MOD on behalf of his new employer.

The Committee also drew Sir Andrew's attention to the normal restrictions it imposes prohibiting lobbying and the misuse of privileged information obtained while in public office.

The [letter](#) containing the Committee's views was sent in August 2016.

The Permanent Secretary at the MOD replied to the Committee's letter. He said that he shared the Committee's frustration that Sir Andrew's appointment was publicly announced before the Committee had been given time to consider it. The Department was not aware of the announcement when it forwarded Sir Andrew's application to the Committee. MOD policy is clear that applicants should not announce or take up appointments covered by the Business Appointments Rules until the approval process has been completed.

Air Marshal Sir Christopher Harper, Director General, NATO International Military Staff

Air Marshal Sir Christopher Harper completed his last day as Director General of the NATO International Military Staff on 27 July 2016. His last day of Crown Service was 27 January 2017.

INDEPENDENT CONSULTANCY AND COMMISSIONS

Air Marshal Sir Christopher Harper sought advice on setting up an independent consultancy and taking up a number of commissions.

CH4C Global Ltd would principally offer geopolitical and strategic consulting services in the international defence and security sector. The company would not provide direct commercial or contracting advice.

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. He had no official dealings or relationships with any of the organisations set out below.

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 below) 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.

The [advice letter](#) was sent in December 2016 and the commissions were taken up as follows:

- Mentor for Exercise Collective Action, UK Higher Command and Staff Course final exercise, involving a NATO/Baltic defence scenario: 27 March – 5 April 2017.
- Advisory Board Member, Improbable Worlds Ltd: from 6 February 2017.
- Senior advisor and mentor for Rescue Global Ltd: from 3 April 2017.
- Advisor on international relations, contemporary risk-management in the security and defence domain, and capability gap analysis and mitigation with L-3 Communications: from 27 April 2017.
- Non-Resident Senior Fellow, The Atlantic Council: from 20 February 2017.

Rupert Harrison, Special Adviser, HM Treasury

Rupert Harrison left his role as Special Adviser in HM Treasury in March 2015.

CHAIR OF ADVISORY BOARD, THE FORE TRUST

Rupert Harrison sought the Committee's advice about taking up the position of Chair of the Advisory Board at The Fore Trust. This is a sub trust of The Bulldog Trust, a charity providing grants and technical support to new innovative charities and social enterprises.

In considering the application the Committee noted that this is an unpaid role, which will amount to the equivalent of two days' work per year and is unlikely to include any contact or dealings with Government.

The Committee took into account that Mr Harrison had no official dealings with The Bulldog Trust/ The Fore Trust in his last two years of service. They also noted that HM Treasury indicated that they could see no conflict of interest and were content for Mr Harrison to take up this post.

The Permanent Secretary accepted the Committee's advice that in accordance with the Government's Business Appointment Rules, the post be subject to the following conditions:

- he should not draw on privileged information available to him from his time in Crown service; and
- for two years from his last day in service he should not become personally involved in lobbying the UK Government on behalf of The Bulldog Trust/ The Fore Trust or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure business on behalf of The Bulldog Trust/ The Fore Trust or those they represent.

The [letter](#) containing the Committee's advice was sent in November 2016.

Dr Felicity Harvey, DG for Public and International Health, Department of Health

Dr Felicity Harvey left her role as DG for Public and International Health at the Department of Health, in June 2016.

NON-EXECUTIVE DIRECTOR AT GUY'S AND ST THOMAS'S NHS FOUNDATION TRUST

Dr Harvey sought advice on taking up an appointment as non-executive director at Guy's and St Thomas's NHS Foundation Trust. The role is part-time (approximately three days per month) and paid. It is not likely to include any contact or dealings with the Department of Health or with government more generally.

When considering this application the Committee took into account that Dr Harvey has had some limited official dealings with the Trust but as she has not been involved in any decisions affecting the Trust, the Committee does not consider that the appointment could be perceived as a reward.

The Prime Minister accepted the Committee's advice that there was no reason why Dr Harvey should not take up this position, subject to the following conditions:

- She should not draw on (disclose or use for the benefit of herself or the organisations to which this advice refers) any privileged information available to her from her time in Crown service;
- For two years from her last day in Crown service, she should not become personally involved in lobbying the UK Government on behalf of Guy's and St Thomas's NHS Foundation Trust or make use, directly or indirectly, of her contacts in Government and/or Crown service to influence policy or secure funding on behalf of the Trust.

The [letter](#) containing the final advice was sent in September 2016 and the appointment was taken up later that month.

Michael Hearty, Director General for Finance and Corporate Services, Welsh Government

Michael Hearty left his role as Director General for Finance and Corporate Services in the Welsh Government in September 2015.

INDEPENDENT ADVISER TO THE AUDIT COMMITTEE OF PUBLIC HEALTH ENGLAND (PHE)

Mr Hearty sought the Committee's advice on taking up a role with PHE as an Adviser to the Audit Committee. When considering this application, the Committee took into account that Mr Hearty had not had any official dealings with PHE whilst in office and the role would not involve dealings with the Welsh Government. The Committee further noted that health is a devolved matter and that this role would be based in England and have no relationship with the Welsh Government.

The Committee also noted that the Welsh Government had no concerns about this appointment.

The Committee's advice to the First Minister that this be subject to the following conditions, was accepted:

- 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; and
- for two years from his last day in service, he should not become personally involved in lobbying the Welsh Government on behalf of any of his clients or those he advises.

The Committee sent its [advice letter](#) in May 2016.

NON-EXECUTIVE DIRECTOR AND CHAIR OF THE AUDIT COMMITTEE OF BLACKPOOL TEACHING HOSPITALS NHS FOUNDATION TRUST (BLACKPOOL HOSPITAL TRUST)

Mr Hearty sought the Committee's advice on taking up a role with Blackpool Hospital Trust as a Non-Executive Director and Chair of the Audit Committee. When considering this application, the Committee took into account that Mr Hearty had no official dealings with Blackpool Hospital Trust whilst in office and the role would not involve dealings with the Welsh Government. The Committee further noted that as health is a devolved matter, and that this role would be based in England, it would have no relationship with the Welsh Government.

The Committee also noted that the Welsh Government had no concerns about this appointment.

The Committee's advice to the First Minister that this be subject to the following conditions, was accepted:

- 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; and
- for two years from his last day in service, he should not become personally involved in lobbying the Welsh Government on behalf of any of Blackpool Hospital Trust.

The Committee sent its [advice letter](#) in May 2016.

INDEPENDENT CONSULTANCY

Mr Hearty sought the Committee's advice on setting up an independent consultancy focussing on coaching, transformational change and interim senior executive roles to both the public and private sectors.

The Committee's advice to the First Minister that this be subject to the following conditions, was accepted:

- he should not draw on (disclose or use for the benefit of himself or the organisations he advises) 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 Welsh 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 which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the Welsh Government; and
- for two years from his last day of service, before accepting any new commission he should make a case directly to the Committee to confirm that each individual commission he wishes to undertake would be permissible under the approved terms of the consultancy. (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).

The Committee sent its [advice letter](#) in May 2016.

COMMISSION WITH ACCELERUS

Mr Hearty sought advice from the Committee on taking up a commission with Accelerus, a company providing change management services to public and private sector organisations. The Committee advised that this was consistent with the terms of the consultancy and should be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the organisations 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 Welsh 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 which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the Welsh Government; and
- for two years from his last day of service, before accepting any new commission he should make a case directly to the Committee to confirm that each individual commission he wishes to undertake would be permissible under the approved terms of the consultancy. (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).

The Committee sent its [advice letter](#) in May 2016.

Bronwyn Hill, Permanent Secretary, Department for Environment, Food and Rural Affairs

Bronwyn Hill left her job as Permanent Secretary, Department for Environment, Food and Rural Affairs, in July 2015.

TRUSTEE, THE ROYAL PARKS

Bronwyn Hill sought the Committee's advice about becoming a trustee of The Royal Parks.

Ms Hill's role will be to provide Board level strategic oversight and good governance, helping to secure a successful transition to charitable status.

In considering this application, the Committee took into account that this is an unpaid position. The Committee also noted that Ms Hill had no dealings with The Royal Parks or access to any relevant commercially sensitive information while in office.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her from her time in Crown service; and

- for two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of The Royal Parks.

The [letter](#) containing the final advice was sent in December 2016 and the appointment was announced in February 2017.

UNIVERSITY COURT MEMBER, UNIVERSITY OF GREENWICH

Bronwyn Hill approached the Committee for advice about taking up an appointment at the University of Greenwich.

The Committee noted that Ms Hill intended to become a member of the University Court, which is the main decision making body of the University.

In considering this application, the Committee took into account that this is an unpaid position and is not likely to include any contact or dealings with Ms Hill's former department or Government more generally. The Committee also noted that Ms Hill had no dealings with the University while in office and that her former department had no concerns about the appointment.

The Prime Minister accepted the Committee's advice that the appointment be subject to the following conditions:

- She should not draw on (disclose or use for the benefit of herself or the organisations or persons to which this advice refers) any privileged information available to her from her time in Crown service;
- For two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of the University of Greenwich.

The [letter](#) containing the final advice was sent in November 2016 and Ms Hill took up the appointment in the same month.

Timothy Hitchens, British Ambassador to Japan, FCO

Timothy Hitchens left his role as the British Ambassador to Japan in December 2016.

PRESIDENT OF WOLFSON COLLEGE, OXFORD UNIVERSITY

The Committee wrote to the FCO and noted with concern that Mr Hitchens sought advice on this appointment after it had been announced. The Committee refused to give retrospective advice.

However, the Committee did wish to put in the public domain that:

- Mr Hitchens informed the Committee he will take up the role of President of Wolfson College on 1 May 2018.
- This is a full-time, paid appointment.
- Mr Hitchens confirmed that he was appointed following an open application process.
- Mr Hitchens told the Committee that his role is unlikely to involve any contact with Government.

The Committee also drew Mr Hitchen's attention to the normal restrictions it imposes prohibiting lobbying and using privileged information obtained while in public office.

The [letter](#) containing the Committee's views was sent in March 2017. The FCO also [wrote](#) to Mr Hitchens the same month with their views on the appointment - applying conditions which prohibit lobbying and the use of privileged information obtained while in public office.

Dame Lin Homer, Permanent Secretary and Chief Executive, HMRC

Dame Lin Homer left her role as Permanent Secretary and Chief Executive, HMRC in April 2016.

PUBLIC INTEREST MEMBER, COUNCIL OF THE INSTITUTE OF CHARTERED ACCOUNTANTS TO SCOTLAND

Dame Lin Homer sought the Committee's advice about taking up a paid, part-time role as a Public Interest Member on the Council of the Institute of Chartered Accountants to Scotland (ICAS).

In considering this application the Committee took into account that ICAS accredits chartered accountants who represent taxpayers so there is regular interaction between ICAS and HMRC. ICAS is one of a number of representative bodies, all of whom Dame Lin met on an occasional basis as CEO of HMRC. The Committee is aware that Dame Lin was responsible for staff in the Commercial Directorate who let training contracts to ICAS but neither she nor the CEO Office had any direct involvement in these contracts.

The Committee felt that it was an important consideration in this case that eight months had passed since Dame Lin had left Crown service. It also placed weight on Dame Lin's assurance that she would not lobby or interact with HMRC on behalf of the Institute.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- she should not draw on any privileged information available to her from her time in Crown service;
- for two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of ICAS or its members, or make use, directly or indirectly, of her contacts in Government and/or Crown service to influence policy or secure business on behalf of ICAS or its members; and
- for two years from her last day of service, she should not have any contact with HMRC on behalf of ICAS, or provide advice to ICAS on any matter, or the terms of any bid or contract, relating directly to the work of HMRC.

The [letter](#) containing the final advice was sent in December 2016 and Dame Lin took up the appointment in April 2017.

SUFFOLK COUNTY COUNCIL

Dame Lin sought the Committee's advice about taking up a part-time role to undertake a review of members' remuneration at Suffolk County Council.

The Committee noted that as Chief Executive of HMRC Dame Lin had been involved in the development and administration of departmental tax policy. However, this impacts on all organisations and her appointment would not therefore afford any an unfair advantage.

The Committee also took into consideration that Dame Lin had no official dealings with Suffolk County Council whilst in office and Dame Lin's former department had no concerns about this appointment.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, the position be subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) any privileged information available to her from her time in Crown service; and
- for two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of Suffolk County Council.

The [letter](#) containing the final advice was sent in December 2016 and Dame Lin took up the role later that month.

NON-EXECUTIVE BOARD MEMBER, COMMUNITY ACTION SUFFOLK (CAS)

Dame Lin Homer sought the Committee's advice about taking up a part-time role as a non-executive board member of Community Action Suffolk (CAS).

In considering the application, the Committee took into account that this is an unpaid position. Dame Lin has informed the Committee that the appointment is not likely to include any contact or dealings with her former department or government more generally.

Dame Lin has declared that she had no contractual dealings with her prospective employer over her last two years of service and that she had no access to commercially sensitive information about any of its competitors.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) any privileged information available to her from her time in Crown service; and
- for two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of CAS or those it represents or supports.

The [letter](#) containing the final advice was sent in October 2016 and Dame Lin took up the appointment soon after.

MEMBER OF THE UNIVERSITY OF BIRMINGHAM COUNCIL

Dame Lin sought the Committee's advice about becoming a member of the University of Birmingham Council.

When it considered this application, the Committee took into account that this is an unpaid position. It was also mindful that Dame Lin's relationship with the university is longstanding and predates her move to the civil service.

It noted that as Chief Executive of HMRC Dame Lin had been involved in the development and administration of departmental tax policy. However, this impacts on all organisations of this nature and her appointment would not therefore afford the University an unfair advantage.

The Committee considered that the standard three-month waiting period between leaving paid civil service employment and taking up an outside appointment that usually applies for Permanent Secretaries, should apply in this case.

The Prime Minister accepted the Committee's advice that this appointment be approved subject to the conditions:

- She should not take up this appointment until 29 June 2016;
- She should not draw on any privileged information available to her from her time in Crown service;

- For two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of the University of Birmingham.

The [letter](#) containing the final advice was sent in May 2016 and Dame Lin took up the role at the end of June 2016.

General Sir Nicholas Houghton, Chief of Defence Staff, Ministry of Defence

General Sir Nicholas Houghton left his role as Chief of Defence Staff at the Ministry of Defence in January 2017. His last day in post was 14 July 2016.

INDEPENDENT CONSULTANT - DE VINCULIS LTD AND SUBSEQUENT COMMISSIONS

Sir Nick sought advice on setting up as an independent consultant through a private company (De Vinculis Ltd). Sir Nick described his consultancy as offering strategic advice in 'non-contentious areas that do not relate to Government policy or commercial interests'. His services will focus on advising at board level on corporate leadership, operating model enhancements and geo-political risk.

The Committee noted the time that had passed since Sir Nick's last day of involvement in MOD business. However, given the seniority of Sir Nick's position as Head of the Armed Forces, the Committee considered it was appropriate to recommend a three-month waiting period from last day in Crown service, consistent with the approach it has taken to other Crown servants of equivalent standing.

The Committee also considered it was appropriate to apply to his consultancy a two-year ban on working within the UK Defence market and a two year ban on advising on the terms of bids and contracts that relate to the MOD.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, Sir Nick's independent consultancy should be subject to the following conditions:

- a three-month waiting period from last day in Crown service; that he should not draw on (disclose or use for the benefit of himself or the organisations 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 post he should not work in the UK Defence market;
- for two years from his last day in Crown service, he should not undertake any work as a consultant that involves providing advice to any company or

- organisation on the terms of, or with regard to the subject matter of, a bid or contract relating directly to the work of the MOD or is trading funds;
- for two years from his last day of service he should not become personally involved in lobbying the UK Government on behalf of any of his clients or those he advises, nor make use of, directly or indirectly, his Government and/or Crown Service contacts to influence policy or secure business on behalf of his clients;
 - for two years from his last day in Crown service, before accepting any new commissions and or/before extending or otherwise changing the nature of any commission, he should make a case directly to the Committee to confirm that each individual commission he wished to take would be permissible under the terms of this consultancy.

The Committee sent its [letter](#) of Advice in February 2017

Since establishing the Independent Consultancy the following commissions have been taken up - the Committee's advice letters and the conditions imposed can be accessed using the links:

- [Inter-Mediate](#) (March 2017, the three month waiting period was waived given the public interest in an immediate start date)
- [Carillion](#) (May 2017)
- [BP](#) (May 2017)

Sir Peter Housden, Permanent Secretary, Scottish Government

Sir Peter Housden left his role as Permanent Secretary, Scottish Government, in June 2015.

INDEPENDENT CONSULTANCY AND COMMISSIONS

In the last reporting period Sir Peter sought advice on establishing an independent consultancy to provide professional services in devolution, service integration, leadership and workforce development to governments, regional and local authorities, and voluntary organisations.

In the 2015-16 reporting period the Committee gave advice on the following commissions:

- [Deloitte - in connection with Surrey and Sussex Police Force's Transformational Leadership Programme for Hampshire County Council \(November 2016\)](#)
- [Woodard Academies Trust \(January 2017\)](#)
- [Deloitte - in connection with a 2-hour session on Collaborative Leadership at the Ministry of Defence \(March 2017\)](#)

Vice Admiral Peter Hudson, Commander, NATO Maritime Command, NATO Allied Command

Vice Admiral Peter Hudson left his position as Commander, NATO Maritime Command, NATO Allied Command in October 2015.

INDEPENDENT CONSULTANCY AND SUBSEQUENT COMMISSIONS

Vice Admiral Peter Hudson sought advice on setting up an independent consultancy.

His consultancy will centre on the future operational landscape and potential crises as well as highlighting capability shortfalls across Europe. He expects to undertake work that will utilise his strategic understanding of the international community, to engage in training roles and not to target individual equipment programmes.

When considering this application the Committee took into account that the MOD panel expressed no concerns about Vice Admiral Hudson taking on commissions as an independent consultant, subject to a 2-year lobbying ban.

The Committee considered that given some of the commissions Vice Admiral Hudson intends to take on are closely linked to his most recent role as Commander NATO Maritime Command, it was appropriate for there to be a gap between him leaving the MOD and setting up an independent consultancy.

The Secretary of State for Defence accepted the Committee's advice that the appointment be subject to the following conditions:

- A waiting period of six months from his last day of Crown service;
- 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 which involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of the MOD; and
- 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.

The [letter](#) containing the final advice was sent in August 2016 and his consultancy was activated in October.

Under his independent consultancy, Vice Admiral Hudson has accepted commissions with:

[Burson-Marsteller \(BM\) \(February 2017\)](#)

[NATO Senior Experts Group \(November 2016\)](#)

[L3 Communications \(October 2016\)](#)

Lt Gen Philip Jones, Chief of Staff, NATO, MOD

Lt Gen Philip Jones left his position as Chief of Staff, NATO, MOD in December 2015.

ADVISOR, PA CONSULTING

Lt Gen Philip Jones sought the Committee's advice about taking up an appointment as an advisor to PA Consulting.

He explained that he would focus primarily on business in the USA, specifically on defence and security matters and advising on current military and security thinking. The work he will be engaged in is likely to include organisational advice, process efficiency, systems improvement, training and education.

When considering the application the Committee took into account that the role will not require him to lobby Ministers and he will not be seeking contracts or business directly from the UK MOD.

The Committee also took into account that the MOD business appointments panel expressed no concerns about Lt Gen Jones taking up a position with PA Consulting, subject to a 2-year lobbying ban.

The Secretary of State for Defence accepted the Committee's advice that the appointment be subject to the following conditions:

- For 12 months from his last day of service he should not provide advice to PA Consulting or its clients on the terms of a bid or contract relating directly to the work of the Ministry of Defence;
- He should not draw on any privileged information available to him from his time in Crown service; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of PA Consulting, its subsidiaries or clients. Given the nature of his role with PA Consulting, the Committee would emphasise that this includes lobbying of former colleagues working in the UK Joint Forces Command and/ or working in the transatlantic relationship.

The [letter](#) containing the Committee's advice was sent in June 2016.

Lord Kerslake, Head of the Civil Service and Permanent Secretary, DCLG

Lord Kerslake left his role as Head of the Civil Service in September 2014 and as Permanent Secretary in DCLG in February 2015.

STRATEGIC CONSULTANT, WANDISCO PLC

Lord Kerslake sought advice on taking up a part-time, paid role as a strategic consultant with WANdisco plc, an IT software company.

The Committee noted that Lord Kerslake would consult on global and national government matters, attending meetings with company personnel and potential customers. The Committee also took into account that Lord Kerslake had no official contact with the company whilst in post. While WANdisco has had dealings with other Government departments, Lord Kerslake has undertaken not to become involved in any discussions with Government as part of his role.

In reaching a decision on this application, the Committee took into account that DCLG had no concerns about the propriety of the appointment.

The Prime Minister accepted the Committee's recommendation that this application be subject to the following conditions:

- Lord Kerslake should not draw on any privileged information available to him from his time in Government; and
- for two years from his last day of service, Lord Kerslake should not become personally involved in lobbying the UK Government on behalf of WANdisco.

The Committee's [advice letter](#) was sent in June 2016.

NON-EXECUTIVE MEMBER OF THE BOARD OF GOVERNORS, SHEFFIELD HALLAM UNIVERSITY

Lord Kerslake sought advice on taking up a part-time and an unpaid role with Sheffield Hallam University in a non-executive role as a member of the Board of Governors.

The Committee noted that Lord Kerslake had no official contact with the university during his last two years of Crown service; and whilst the role is likely to involve some limited contact with the department for Business, Innovation and Skills (BIS) on higher education matters, he will not engage in lobbying.

In reaching a decision on this application, the Committee took into account that DCLG had no concerns about the propriety of the appointment.

The Prime Minister accepted the Committee's recommendation that this application be subject to the following conditions:

- Lord Kerslake should not draw on any privileged information available to him from his time in Government; and
- for two years from his last day of service, Lord Kerslake should not become personally involved in lobbying the UK Government on behalf of Sheffield Hallam University. The Committee accepted that he may need to engage with the Government on educational and other issues and in the normal course of university business, as opposed to issues relating to the public funding of Sheffield Hallam University or its students.

The Committee's [advice letter](#) was sent in June 2016 and the post was taken up in October 2016.

MEMBER OF ENGIE UK'S ADVISORY BOARD

Lord Kerslake sought the Committee's advice about taking up a part-time, paid role as a Member of ENGIE UK's Advisory Board. ENGIE is a global company which provides energy supplies and services; as a member of its UK advisory board, Lord Kerslake said he will seek to guide the company in matters relating to its UK strategy.

When considering this application, the Committee took into account the time that had passed since Lord Kerslake had left office, and that he had no official contact with ENGIE UK whilst employed as the Permanent Secretary of DCLG and, later, as the Head of the Civil Service. They also noted that the appointment will not include any contact or dealings with his former department or with government more generally.

The Prime Minister accepted the Committee's recommendation that this appointment be subject to the conditions that:

- Lord Kerslake should not draw on any privileged information available to him from his time in Government; and
- or two years from his last day of service, Lord Kerslake should not become personally involved in lobbying the UK Government on behalf of ENGIE UK.

The Committee's [advice letter](#) was sent in February 2017.

Sir John Kingman, Second Permanent Secretary, HM Treasury

Sir John Kingman left his role as Second Permanent Secretary, HM Treasury in July 2016.

CHAIRMAN, LEGAL & GENERAL

Sir John Kingman sought advice from the Committee on a role as Chairman of Legal & General.

When considering this application, the Committee noted that although during his time at HM Treasury Sir John had occasional dealings with Legal & General, he was not in frequent contact with them and the main relationship with HMT had been managed elsewhere in the department. The Committee also noted that Sir John had some involvement in policy that will have affected Legal & General. However, they took into account the comments of Cabinet Office and HMT that he played no direct role in most policies that affected the company, which were carried out by other teams in the department; and that policies he was directly involved in were strongly pro-consumer.

The Committee noted that Sir John had limited contact with Legal & General's competitors, primarily through general industry discussions, and therefore no access, either formally or informally, to any competitively sensitive information about Legal and General, or its competitors. The Committee was also aware that none of Legal & General's competitors raised any concerns about this prospective appointment.

The Committee took into account the particular circumstances in this case, including the fact that Sir John had agreed, in the public interest, to stay on at HMT as acting Permanent Secretary to prevent there being a gap at a critical time. They also noted that as soon as he was approached about the role with Legal & General, he declared it to his department, and arrangements were put in place to ensure he stood aside from any related issues.

The Prime Minister accepted the Committee's advice that there was no reason why Sir John should not take up this position, subject to the following conditions:

- He should not take up this post until 22 October 2016;
- He should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) privileged information available to him from his time in Crown service; and
- For two years from his last day in service, Sir John should not become personally involved in lobbying the UK Government on behalf of Legal & General or its clients, or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure business on behalf of Legal & General (to avoid any perception of improper influence on Sir John's part, this should include him recusing himself from attending the Chancellor of the Exchequer's meetings with the Chairs of the major insurance companies during this period).

The [letter](#) containing the final advice was sent in October 2016 and the appointment was announced that month.

TRUSTEE AND CHAIR OF THE FINANCE AND AUDIT COMMITTEES, THE NATIONAL GALLERY

Sir John sought the Committee's advice on taking up an unpaid, part-time role as a Trustee and Chair of the Finance and Audit Committees at the National Gallery.

When considering this application, the Committee took into account that arrangements were in place within HM Treasury to ensure that Sir John had no involvement in arts-related matters due to him being a Trustee of the Royal Opera House. The Committee also took into account that HM Treasury has raised no concerns about the appointment.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, this appointment be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the organisations to which this advice refers) privileged information available to him from his time in Crown service; and
- for two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the National Gallery.

The [letter](#) with the Committee's final advice was sent in March 2017 and the appointment was announced the following month.

Dr Vanessa Lawrence, Head of Ordnance Survey International

Dr Vanessa Lawrence left her role as Head of Ordnance Survey International in December 2014.

INDEPENDENT CONSULTANT

In the last reporting year Dr Lawrence sought advice on setting up as an independent consultant, to provide strategic advice on how to optimise information assets in the global digital arena.

During the 2015-16 reporting period the Committee gave advice on the following commissions under her consultancy:

- [Australian Government \(September 2016\)](#)
- [Third Bridge \(October 2016\)](#)
- [Pool Reinsurance Company Ltd \(November 2016\)](#)

Lord Macpherson, Permanent Secretary, HM Treasury

Lord Macpherson left his role as Permanent Secretary, HM Treasury, in March 2016.

NON-EXECUTIVE DIRECTOR, BRITISH LAND PLC

Lord Macpherson sought advice on accepting an appointment as non-executive director of British Land plc.

The Committee noted that the role would be a paid, part-time position, involving 12-18 days' work per year. It is not likely to include any contact or dealings with either the Treasury or with Government more widely.

When considering this application the Committee took into account that Lord Macpherson had no contact with the company while in post; that HM Treasury had no concerns about the appointment and that eight months had passed since Lord Macpherson's last day in Crown service.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- He should not draw on privileged information available to him from his time in Crown service; and
- For two years from his last day in service, Lord Macpherson should not become personally involved in lobbying the UK Government on behalf of British Land plc, or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure business on behalf of British Land plc.

The [letter](#) containing the final advice was sent in December 2016 and the appointment was taken up later that month.

NON-EXECUTIVE DIRECTOR, SCOTTISH AMERICAN INVESTMENT TRUST

Lord Macpherson sought advice on accepting an appointment as non-executive director of the Scottish American Investment Trust. The role would involve around six days' work per year and would not include any contact with HMT or Government more generally.

The Committee took into account that Lord Macpherson had no dealings with the Trust while in post. Neither did he have any contact with Baillie Gifford, the asset management firm that manages the Trust. HM Treasury has confirmed that, other than in relation to general tax policy, which affects all companies, he has had no direct involvement in policy making that could affect the Trust.

The Committee also took into account that HM Treasury had no concerns about the appointment and that nearly six months have past since Lord Macpherson's last day in Crown service.

The Prime Minister accepted the Committee's advice that there was no reason why Lord Macpherson should not take up this position, subject to the following conditions:

- He should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) privileged information available to him from his time in Crown service; and
- For two years from his last day in service, Lord Macpherson should not become personally involved in lobbying the UK Government on behalf of Scottish American Investment Trust or its parent company, Scottish American Investment Company plc, or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure business on behalf of Scottish American Investment Trust or its parent company.

The [letter](#) containing the final advice was sent in September 2016 and the appointment was taken up later that month.

CHAIRMAN, C HOARE & CO

Lord Macpherson sought advice on accepting an appointment as Chairman of C Hoare & Co, a small retail bank. This would be a part time role, involving around two days' work per week, and would not include any contact with HMT or Government more generally.

The Committee noted the following facts about HMT's relationship with banks:

- While HMT sets the overall legislative framework within which banks operate, it has no role in regulatory decisions as regards individual banks;
- Decisions concerning the Prudential and Conduct Regulation of banks are taken by the PRA and FCA respectively;
- These regulators have statutory independence from HMT, with their own boards and independent decision making processes;
- On tax, HMT sets the overall tax regime, but has no role in the tax affairs of individual companies, which are handled by HMRC completely independently of HMT.

The Committee noted that HMT had contacted potential competitors of C Hoare & Co about this move, none of whom raised any concerns.

The Committee noted that, as a former Permanent Secretary, Lord Macpherson is subject to the standard three month waiting period from his last day of service. Given HMT's oversight of financial services, the Committee considered whether an additional waiting period was appropriate

in this case. However, it took into account the views of HMT and Cabinet Office, including specific details about the relationship between C Hoare & Co and HMT, the fact that there does not appear to be any reasonable perception of reward with the move, and that potential competitors have been consulted and have no concerns. The Committee therefore concluded that the three month waiting period for Permanent Secretaries would be a sufficient gap in this case.

The Prime Minister accepted the Committee's advice that there was no reason why Lord Macpherson should not take up this position, subject to the following conditions:

- A waiting period of three months from his last day in Crown service;
- He should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) privileged information available to him from his time in Crown service; and
- For two years from his last day in service, Lord Macpherson should not become personally involved in lobbying the UK Government on behalf of C Hoare & Co or its clients, or make use, directly or indirectly, of his contacts in Government and/or Crown service to influence policy or secure business on behalf of C Hoare & Co.

The [letter](#) containing the final advice was sent in July 2016 and the appointment was announced that month.

Susanna Mason, Director General, Commercial, Defence Equipment and Support, MOD

Susanna Mason left her position as Director General, Commercial, in Defence Equipment and Support (DE&S) within the MOD, in February 2016.

REGIONAL SENIOR PARTNER, PWC MIDDLE EAST

Susanna Mason sought advice about taking up an appointment with PwC Middle East as a Regional Senior Partner.

Ms Mason told the Committee that her role would be to advise governments and organisations throughout the Middle East on strategies for broadening non-oil revenue sources and achieving fiscal sustainability.

When considering this application the Committee took into account that her appointment would not include any contact or dealings with her former department or government more generally. A substantial contract was awarded to PwC by DE&S at MOD while Ms Mason was DG Commercial but the Committee was assured that she had no involvement in granting or managing the contract. The Committee was also assured that she has had no other official dealings with the company, has not been involved in any

decisions that might affect the business of PwC with MOD and that she has not been involved in any policy decisions or regulatory work that have affected or could affect PwC or its competitors.

Ms Mason and PwC expressly confirmed to the Committee that her role would be wholly outside the defence sector and as such she would not be working with Defence departments or the defence industry.

The Committee considered that given her previous roles in MOD, and also PwC's continuing relationship with DE&S, the appointment may give rise to some public concern (unofficial reports about Ms Mason's appointment to PwC had already appeared in the media). The Committee considered that it was appropriate for there to be a gap between Ms Mason leaving the MoD and taking up a position with PwC.

The Secretary of State for Defence accepted the Committee's advice that the appointment be subject to the following conditions:

- A waiting period of six months from her last day of Crown service;
- She may not contact defence departments of other governments, the defence industry or the UK Ministry of Defence for twenty-four months from her last day of Crown service in her capacity as an employee of PwC;
- For 12 months from her last day of service she should not provide advice to PwC or its clients on the terms of a bid or contract relating directly to the work of the Ministry of Defence;
- She should not draw on any privileged information available to her from her time in Crown service; and
- For two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of PwC, its subsidiaries or clients.

The Committee subsequently clarified that the waiting period means that Ms Mason may not take up compensated employment with or assignment by PwC in any capacity until 1 September 2016 – 6 months from her last day in Crown Service. This restriction includes any roles and responsibilities for PwC in the United Kingdom, the European Union, the United States, the Middle East or any other international location.

The [letter](#) containing the Committee's advice was sent in April 2016.

Charlie Massey, Director General for Strategy and External Relations, Department of Health

Charlie Massey, Director General for Strategy and External Relations, Department of Health, will leave his role in October 2016.

CHIEF EXECUTIVE AND REGISTRAR, GENERAL MEDICAL COUNCIL

Mr Massey sought the Committee's advice on a new role as Chief Executive and Registrar of the General Medical Council (GMC) after he leaves Crown service in October 2016.

When considering this application the Committee took into account that Mr Massey had applied for the role and been offered it following an open competition. They noted that the role is likely to involve contact with government, and the Department of Health's view that the move from the department to the health and care sector was of clear benefit to both sides and could not be seen as improper.

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

- Mr Massey should not draw on privileged information available to him from his time in Crown service, including information relating to unannounced Government policy; and
- For two years from his last day in service, Mr Massey should not become personally involved in lobbying the UK Government on behalf of the GMC; in this case the Committee accepts that this would not prevent communications with the UK Government that are in the normal course of business for the GMC as a regulator, but it would prevent his involvement in any discussions with Government relating to the funding of the GMC.

The [letter](#) containing the final advice was sent in July 2016 and the appointment was announced that month.

Lt Gen Mayall, Senior Adviser for the Middle East, MOD

Lt Gen Mayall left his role as Senior Adviser for the Middle East in July 2015.

CONSULTANT, BRIGHTSTONE MIDDLE EAST AND INDEPENDENT CONSULTANCY

Sir Simon sought advice on taking up an appointment with Brightstone Middle East and setting up an independent consultancy.

The Committee noted that Sir Simon proposed to accept a position as a consultant with Brightstone Middle East, a British-Emirati company, facilitating British companies that wish to set up, operate or trade with the UAE and some other Middle Eastern countries. Sir Simon would be employed to provide advice on the company's business development and potentially become involved with client management in the UK.

Sir Simon also intended to establish an independent consultancy that would focus on giving strategic level advice on risk and opportunity to companies wishing to understand the Middle East and North Africa or to do business there. He sought the Committee's advice about a role as a Senior Advisory Board Member for Greenhill and Co International in July 2015 and would continue this work through his consultancy.

When considering this application the Committee took into account that the role with Brightstone Middle East would not involve any contact or dealings with the MOD or government more generally and that the MOD Business Appointments Panel expressed no reservations about Sir Simon taking up the position and establishing an independent consultancy, subject to conditions.

The Secretary of State for Defence accepted the Committee's advice that these appointments be subject to the following conditions:

- He should not draw on 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 any of his clients or those he advises;
- He should revert to the Committee for permission prior to working on defence-related business for Brightstone Middle East; and
- 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 terms of his independent consultancy and the Business Appointments Rules. (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).

The letter containing the final [advice](#) was sent in September 2016. The appointment with Brightstone Middle East was subsequently taken up.

June Milligan, Director General, Welsh Government

June Milligan left her role as Director General, Welsh Government, in September 2015.

WALES COMMISSIONER, EQUALITY AND HUMAN RIGHTS COMMISSION

Ms Milligan sought advice on accepting a role as the Wales Commissioner for the Equality and Human Rights Commission.

When considering the application, the Committee took into account that this is a public appointment, which will involve around 25 days' work per year. The Committee noted that the EHRC is a statutory body with duties relating to the promotion and advancement of equality and human rights, including through

regulatory means. These duties include monitoring the statutory Public Sector Equality Duty, which extends to public bodies and the Welsh Government, and therefore the role is likely to involve some contact with Government.

The Committee took into account the fact that the Welsh Government had no difficulties with her taking up this role, and that they could see no reason why it should give rise to any concerns.

The First Minister accepted the Committee's advice that there was no reason why Ms Milligan should not take up this appointment, subject to the following conditions:

- For two years from her last day of service, she should not become personally involved in lobbying the Welsh Government except for the purposes of carrying out her role as the Wales Commissioner for EHRC; and
- She should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) privileged information available to her from her time in Crown service.

The [letter](#) containing the final advice was sent in April 2016 and the appointment was announced in May 2016.

Lord Jonathan Oates, Chief of Staff to the Deputy Prime Minister

Lord Jonathan Oates left his role as Chief of Staff to the Deputy Prime Minister in March 2015.

CONSULTANT, TENDO

Lord Oates sought the Committee's advice about taking up paid employment with Tendo, a communications consultancy set up by David Carroll and Will de Peyer, former, fellow special advisers to the Deputy Prime Minister. Lord Oates told the Committee he will provide ad hoc consultancy support on media communications and policy issues; and introduce potential clients with a specific focus on international opportunities.

The Committee took into account that Lord Oates said the role would not involve any contact or dealings with Government; and that the Cabinet Office had no reservations about this appointment.

The Committee took into consideration that Mr Carroll and Mr de Peyer had sought advice from the Committee in relation to their consultancy. That advice required them to approach the Committee to seek advice for each individual commission to be undertaken by Tendo, for two years from their last day in crown service.

The Committee advised that Lord Oates' appointment should be 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 Tendo or its clients; and
- he should not draw on privileged information available to him from his time in Crown service.

The Committee wrote its [advice letter](#) in April 2016.

Sarah Rapson, Director General of UK Visas and Immigration, Home Office

Sarah Rapson left her role as Director General of UK Visas and Immigration in the Home Office in October 2016.

DIRECTOR OF AUTHORISATIONS, FINANCIAL CONDUCT AUTHORITY

Ms Rapson sought the Committee's advice about taking up the role of Director of Authorisations at the Financial Conduct Authority (FCA).

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 this appointment be 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.

The letter containing the final [advice](#) was sent in September 2016 and Ms Rapson took up the appointment in October.

Sir Peter Ricketts, Ambassador to France and Monaco

Sir Peter left his role as Ambassador to France and Monaco in January 2016.

NON EXECUTIVE DIRECTOR, ENGIE

Sir Peter Ricketts sought advice on accepting a role as a Non Executive Director of Engie, a global energy producer with its headquarters in France.

The Committee noted that Sir Peter would be one of the eight independent members on Engie's board. They took into account that he had met with representatives of Engie, as well as other energy companies, while Ambassador in France. However, they noted that these meetings were as part of the process of keeping in contact with the heads of all major French investors in the UK, and were reported to other UK Government Departments, to inform their decision making. The Committee also took into account that the Foreign Office had no concerns about Sir Peter taking up this post.

The Committee noted that both the automatic three month waiting period for Permanent Secretary equivalents and the six month ban on taking up business interests relating to an Ambassador's country of last posting will have elapsed before Sir Peter's proposed start date of 1 August.

The Foreign Secretary accepted the Committee's advice that there is no reason why Sir Peter should not take up this role, subject to the following conditions:

- 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; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of Engie, its subsidiaries or clients.

The [letter](#) containing the final advice was sent in April 2016 and the appointment was announced in May 2016 (to be taken up in August).

Thea Rogers, Chief of Staff to the Chancellor

Thea Rogers left her role as Chief of Staff to the Chancellor in July 2016.

DELIVEROO

Ms Rogers sought advice from the Committee about on taking up a role with Deliveroo.

When considering this application the Committee noted that it was a full-time, paid role working on communication and policy for Deliveroo.

The Committee took into consideration that Ms Rogers had no official dealings with Deliveroo while in office and that, whilst her role as adviser to the Chancellor involved some policy discussions, HMT confirmed she would

not have had access to commercially sensitive information and there had been no significant overlap between the policy areas she worked on and Deliveroo.

The Permanent Secretary accepted the Committee's advice that in accordance with the Government's Business Appointment Rules, the appointment be subject to the following conditions:

- she should not draw on any privileged information available to her from her time in Crown service;
- for two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of Deliveroo or its clients.

The [letter](#) containing the final advice was sent in December 2016 and the appointment was taken up in January 2017.

Jon Rouse, Director General, Department of Health

Mr Jon Rouse will leave his role as Director General in the Department of Health in July 2016.

CHIEF OFFICER OF GREATER MANCHESTER HEALTH AND SOCIAL CARE PARTNERSHIP, NHS ENGLAND

Mr Jon Rouse asked for the Committee's advice about an appointment with NHS England that had already been publicly announced. The Committee wrote to the Department of Health registering its concern about the timing of the application. The Committee noted that the Business Appointment Rules specify that retrospective applications will not normally be accepted. To fulfil the remit given to it by Government the Committee needs to be able to consider an application fully and freely before offering its advice. This is impossible to do in a way that will command public confidence if an appointment has already been announced and/or taken up. Therefore, the Committee was unwilling to give retrospective approval for the appointment.

The Committee formally recorded that:

- Mr Rouse has informed the Committee that his role is Chief Officer, Greater Manchester Health and Social Care Partnership and that he will lead the body overseeing devolution of health and social care in Greater Manchester.
- NHS England is an arms-length body of the Department of Health and the Greater Manchester Devolution Project is a product of Government Policy.
- While at the Department of Health Mr Rouse had worked closely with his prospective employer and had an influence over ministerial decisions affecting it.
- Mr Rouse was appointed following an open application process.

- Mr Rouse will need to have contact with Government to carry out this role.

The Committee also drew Mr Rouse's attention to the normal restriction imposed prohibiting the misuse of privileged information obtained while in public office.

The [letter](#) containing the Committee's views was sent in April 2016.

Ms Sandby-Thomas, Department for Business, Energy and Industrial Strategy

Ms Sandby-Thomas left the Department for Business, Energy and Industrial Strategy in August 2016.

REGISTRAR, WARWICK UNIVERSITY

Ms Rachel Sandby-Thomas asked for the Committee's advice about an appointment with Warwick University that had already been publicly announced. The Committee wrote to the Department of Business, Energy and Industrial Strategy registering its concern about the timing of the application. The Committee noted that the Business Appointment Rules specify that retrospective applications will not normally be accepted. To fulfil the remit given to it by Government the Committee needs to be able to consider an application fully and freely before offering its advice. This is impossible to do in a way that will command public confidence if an appointment has already been announced and/or taken up. Therefore, the Committee was unwilling to give retrospective approval for the appointment.

However the Committee formally recorded that:

- As Registrar, Ms Sandby-Thomas will be responsible for running the non-academic side of the University. She will be head of the professional and administrative services and have responsibility for strategy.
- She has had no significant prior contact with the University.
- The Department had no reservations about the appointment.
- She was appointed following an application process.
- Ms Sandby-Thomas has advised the Committee that Warwick University is a member of The Russell Group of universities and through The Russell Group is in contact with Government on matters affecting higher education. The Committee would expect Ms Sandby-Thomas to adhere to the usual condition it recommends in business appointment cases, precluding the lobbying of Government.

The Committee also drew Ms Sandby-Thomas' attention to the normal restriction it imposes prohibiting the misuse of privileged information obtained while in public office.

The [letter](#) containing the Committee's views was sent in August 2016.

Sir John Sawers, Chief of the Secret Intelligence Service

Sir John Sawers left his role as Chief of the Secret Intelligence Service in November 2014.

ADVISORY BOARD MEMBER, EDELMAN UK

Sir John Sawers sought the Committee's advice about taking up an appointment as a member of the Advisory Board of Edelman UK.

Sir John will provide advice to the leadership of Edelman UK on the strategic direction of the company and its interaction with clients. The role will involve no more than 3-4 meetings a year.

When it considered this application, the Committee noted that Sir John had no official contact with Edelman UK during his last two years in Crown service, that he had no official dealings with competitors of his prospective employer and had no access to commercially sensitive information about them. The Committee also took into account that the appointment will not include any contact or dealings with government.

The Foreign Secretary accepted that Committee's advice that there was no reason why he should not take up this appointment, subject to the conditions that:

- 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 service, he should not become personally involved in lobbying the UK Government on behalf of Edelman.

The final [advice](#) was sent in June 2016 and Sir John commenced the appointment later that month.

Sir Adam Thomson, Ambassador to NATO

Sir Adam Thomson will leave his role as Ambassador to NATO in November 2016.

DIRECTOR, EUROPEAN LEADERSHIP NETWORK

Sir Adam sought the Committee's advice on a role as Director of the European Leadership Network (ELN), a think tank specialising in security issues.

When considering this application, the Committee noted that Sir Adam's new role is a full time one and involves running the organisation. He was offered the role having applied for an advertised post.

The Committee noted that the role may involve some contact with the UK Government and the FCO due to the fact that, as a think tank, the ELN communicates with officials and Ministers in a wide range of European and North American Governments, including the UK. However, Sir Adam has been clear that he would have no contact with the Government regarding funding of the think tank.

The Committee took into account the views of the FCO, who did not believe that there could be any perception of reward with this appointment, and confirmed that Sir Adam had not had access to any commercially valuable or sensitive information.

The Committee advised the Foreign Secretary that it could see no reason why Sir Adam should not take up this post, subject to the following conditions:

- He should not draw on any privileged information available to him from his time in Crown service;
- For six months from his last day in Crown service, Sir Adam should not have dealings with or advise on matters relating to NATO; and
- For two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of the ELN or its clients. This does not preclude contact with Government through sharing ideas and thinking, but does preclude any interaction with Government, including making use, either directly or indirectly, of his contacts in Government and/or Crown service, to influence funding or grants for the ELN.

The [letter](#) containing the final advice was sent in August 2016 and the appointment was announced in September 2016.

Sir Peter Westmacott, Ambassador to Washington DC

Sir Peter Westmacott left his role as Ambassador to Washington DC in January 2016.

SPEAKER, LONDON SPEAKER BUREAU

Sir Peter Westmacott sought the Committee's advice on joining the London Speaker Bureau as an occasional speaker

The committee noted that Sir Peter would speak to commercial gatherings, usually but not always, off-the-record, about Brexit, transatlantic relations, the

US presidential races, Turkey, Iran and diplomacy in general. It was expected to involve one or two days' work per month.

The Committee noted that this role was unlikely to include any contact or dealings with his former department or government more generally; and Sir Peter's former department has no reservations about the appointment.

The Foreign Secretary accepted the Committee's advice, in accordance with the Government's Business Appointment Rules, this appointment be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the organisations to which this advice refers) any privileged information available to him from his time in Crown service; and
- for two years from his last day of service, Sir Peter should not become personally involved in lobbying the UK Government on behalf of the London Speaker Bureau, or its clients.

The [letter](#) containing the final advice was sent in July 2016.

ADVISORY BOARD MEMBER, CAMPBELL LUTYENS

Sir Peter Westmacott sought the Committee's advice about taking up a role as a member of the advisory board of Campbell Lutyens, a financial services company.

Sir Peter told the Committee his role as a member of the advisory board at Campbell Lutyens will be a paid position, likely involving one day of work per month. The role would include: four board meetings and a few ad hoc conferences and dinners a year; and providing occasional geo-strategic advice.

Sir Peter told the Committee that in his ambassadorial roles he sometimes hosted receptions, at the expense of the firm or association concerned, to promote the UK financial services industry in the United States. He hosted a reception for Campbell Lutyens six years ago, while he was Ambassador in Paris.

The Committee also noted that this role was unlikely to include any contact or dealings with his former department or government more generally; and Sir Peter's former department has no reservations about the appointment.

The Committee's advice to the Foreign Secretary was accepted - that, in accordance with the Government's Business Appointment Rules, this appointment be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the organisations to which this advice refers) any privileged information available to him from his time in Crown service; and

- for two years from his last day of service, Sir Peter should not become personally involved in lobbying the UK Government on behalf of Campbell Lutyens or its clients.

The [letter](#) containing the final advice was sent in July 2016.

DISTINGUISHED AMBASSADORIAL FELLOW, THE ATLANTIC COUNCIL

Sir Peter Westmacott sought the Committee's advice about taking up a role as a distinguished ambassadorial fellow for the Atlantic Council, a US think tank promoting constructive leadership and engagement in international affairs.

Sir Peter explained this role, as a non-resident fellow within the Atlantic Council's Future Europe Initiative (FEI), would involve taking part in events and conferences, writing occasional papers, and providing expertise on US-UK relations; the future of Europe; Turkey/EU; Iran; and transatlantic relations in general.

The Committee took into account that, while Ambassador to the US, Sir Peter did deal with the Atlantic Council. However, these dealings were in the normal course of business and he had equivalent dealings with a number of other US think tanks; these dealings involved the think tanks providing platforms for visiting HMG officials and Ministers, and hosting UK guests of honour at their gala dinners.

The Committee noted that this role would largely be funded through the Atlantic Council by United Technologies Corporation, a US company. The Committee also took into account that the role will not involve any contact with the Government; and Sir Peter's former department, the FCO, had no reservations about the appointment.

The Foreign Secretary accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, this appointment be subject to the following conditions:

- Sir Peter should not draw on privileged information available to him as a Crown servant; and
- for two years from his last day of service, Sir Peter should not become personally involved in lobbying the UK Government on behalf of the Atlantic Council or United Technologies Corporation.

The [letter](#) containing the final advice was sent in September 2016.

VICE CHAIRMAN, TELLUS MATRIX

Sir Peter Westmacott sought the Committee's advice about becoming Vice Chairman of the Tellus Matrix Group - an advisory company.

The Committee noted that the Tellus Matrix Group will advise governments, NGOs, institutions, individuals and corporations from around the world. As Vice Chairman, Sir Peter said he will support the business in all areas, providing country-specific knowledge and strategic thinking drawn from his political and diplomatic experience; alongside a leadership and oversight role.

The Committee noted that this role may involve some contact with Ministers, for example by notifying the UK Government of particular projects at a point it might want to become involved or aware of them. This is a new organisation, and therefore Sir Peter had no dealings with them while in post.

The Committee also took into account the views of Sir Peter's former department, the FCO, which had no reservations about the appointment.

The Foreign Secretary accepted the Committee's advice, that in accordance with the Government's Business Appointment Rules this appointment be subject to the following conditions:

- Sir Peter should not draw on privileged information available to him as a Crown servant; and
- for two years from his last day of service, Sir Peter should not become personally involved in lobbying the UK Government on behalf of the Tellus Matrix Group or its clients.

The [letter](#) containing the Committee's advice was sent in October 2016.

Graeme Wilson, Press Secretary to the Prime Minister

Graeme Wilson left his role as Press Secretary to the Prime Minister in July 2016.

PARTNER OF TULCHAN COMMUNICATIONS

Graeme Wilson sought the Committee's advice about taking up a full-time, paid role as a Partner of Tulchan Communications, a financial communications advisory firm. The Committee noted that Mr Wilson would offer strategic advice to Tulchan Communications' clients on how to handle press and media issues they may face. He would also offer strategic advice on how the Government might handle issues affecting clients.

When considering this application, the Committee took into account that Mr Wilson had made clear that he would not lobby Government. The Committee noted that Mr Wilson's role might 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.

The Permanent Secretary for the Cabinet Office accepted the Committee's advice that the appointment be subject to the following conditions:

- that 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 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.

The [letter](#) containing the final advice was sent in November 2016 and Mr Wilson took up the appointment in December.

Admiral Sir George Zambellas, First Sea Lord

Admiral Sir George Zambellas left his position as First Sea Lord in April 2016.

CEO COBWEB CYBER LTD

Sir George sought the Committee's advice about becoming CEO of a new start-up cyber security business called Cobweb Cyber Ltd.

Sir George explained that Cobweb Cyber will supply advice to CEOs and senior board members, in support of their responsibilities as directors, in order to better manage cyber risk across their businesses. The role is not likely to involve any contact with his former department or Government more widely.

When considering this application the Committee took into account that Sir George expects to provide advice to Health trusts or on health-related data management, but may also operate in the commercial maritime sector. It noted that Sir George informed the MOD that he has not had any dealings with these organisations, or been involved in any decisions that might affect them, or been involved in any dealings with their competitors, during his last two years in office.

The Committee also took into account that the MOD Business Appointments Panel expressed no concerns about Sir George taking up this position, subject to behavioural conditions.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, this appointment be subject to the following conditions:

- that he should not draw on (disclose or use for the benefit of himself or the organisations 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 Crown service, he should not become personally involved in lobbying the UK Government on behalf of clients of Cobweb Cyber Ltd or those it advises, nor should he make use, directly or indirectly, of his Government and/or Crown service contacts to influence policy or secure business on behalf of its clients; and
- for two years from his last day of service he should not undertake any work as CEO of Cobweb Cyber Ltd that involves providing advice to any company or organisation involved in or on matters relating to the UK defence market.

The [advice letter](#) was sent to the Ministry of Defence in March 2017 and Sir George took up the position in the same month.

SENIOR ADVISORY BOARD MEMBER, LIQUID ROBOTICS, INC.

Sir George sought the Committee's advice about taking up a role with Liquid Robotics, Inc., an American company, which designs and manufactures ocean robots. Liquid Robotics works with defence, commercial and science customers.

As a Senior Advisory Board Member, Sir George will provide strategic advice and guidance on robotics, unmanned systems and maritime technology and their use globally across all maritime sectors.

When considering the application the Committee took into consideration that Sir George had no official dealings with Liquid Robotics whilst in post and he had no access to commercially sensitive information relating to the company.

The Committee took particular interest in the recent acquisition of Liquid Robotics by the Boeing Company (Boeing). The Committee was reassured that Sir George was unaware of Boeing's involvement until it was announced, on 6 December, two months after he was offered the role. The Committee also took into consideration that whilst Sir George is aware of numerous contracts Boeing has with the MOD, he has had no involvement in procurement, nor any official dealings with them. The Committee also noted the role is unlikely to involve any contact with the MOD or Government in general.

The Committee took into account the view of the MOD Business Appointments Panel, which expressed no concerns about Sir George taking up this position, subject to a two-year lobbying ban. It was mindful that whilst he had access to top level information at the MOD, Liquid Robotics work with new technology, and have no relationship with MOD. However, they would expect Sir George's work under this application to be restricted to working with Liquid Robotics; and any change to his role to work with Boeing should come through the usual business appointments application process.

The Committee recommended a number of conditions in order to mitigate against any perception that Sir George would unfairly advantage any future move by Liquid Robotics into the UK, and therefore potential contracts with the MOD.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, this appointment be subject to the following conditions:

- for two years from his last day of Crown service he should not provide advice to Liquid Robotics Inc or The Boeing Company on the terms of a bid or contract relating directly to the work of the MOD;
- for two years from his last day in Crown service he should only undertake the work for Liquid Robotics to which this application relates and should not undertake work on any wider basis for either Liquid Robotics or The Boeing Company without seeking advice from the Committee under a separate application;
- he should not draw on any privileged information available to him from his time in Crown service; and
- for two years from his last day in Crown service, he should not become personally involved in lobbying the UK Government on behalf Liquid Robotics Inc, or make use, directly or indirectly, of his contacts in Government and/ or Crown service to influence policy or secure business on behalf of Liquid Robotics Inc or The Boeing Company, or their representatives.

The [advice letter](#) was sent to the Ministry of Defence in March 2017 and Sir George took up the position in the same month.

CHAIRMAN, PRAXEC LIMITED

Sir George sought the Committee's advice on becoming chairman and director of Praxec Limited, an executive leadership consultancy.

When considering this application the Committee noted that Sir George did not have any official dealings with Praxec (it is a new company) or involvement in any decisions that might affect the business of the company. It took into account advice from the MOD that the nature of the company and the proposed appointment are not related to MOD procurement activities.

The Committee also took into account that the MOD Business Appointments Panel expressed no concerns about Sir George taking up this position, subject to a two-year lobbying ban. It was mindful that Sir George was proposing to become chairman and director of a new company making use of his expertise in leadership, away from the Defence world, and the role will not require him to have any dealings with Government.

As the rank of Admiral is equivalent to Permanent Secretary, and given the seniority of Sir George's position as Head of the Navy, the Committee considers that it is appropriate to recommend a three-month waiting period from last day in Crown service, consistent with the approach it takes to other Crown servants of equivalent standing.

The Secretary of State for Defence accepted the Committee's advice that the appointment be subject to the following conditions:

- A three-month waiting period from last day in Crown service;
- That he should not draw on (disclose or use for the benefit of himself or the organisations 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 Crown service, he should not become personally involved in lobbying the UK Government on behalf of Praxec Limited or its clients.

The letter containing the final [advice](#) was sent in November 2016 and the appointment was announced that month.

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