



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: ADMIRAL SIR GEORGE ZAMBELLAS

The Committee has been asked to consider an application from Admiral Sir George Zambellas, former First Sea Lord, who proposes to take up a position as the Chair of the Senior Advisory Board at Pagefield Global Counsel Ltd (PGC).

Sir George was First Sea Lord between April 2013 and April 2016. His last day in Crown service was 21 August 2016.

Appointment Details

PGC is a public relations firm with expertise in litigation, crisis communications and international affairs." Clients include international business, trade associations, governments and individuals. The company was incorporated in August 2017.

Sir George stated his role as Chair will be paid and will involve providing "*strategic analysis and advice, profile building and business development within key markets, to include sovereign bodies, international business, political parties, Non-Governmental Organisations, investment bodies, and other similar organisations, as well as contributing to thought leadership and client advice.*" He said this role is not likely to include contact with Government.

Sir George confirmed he had no previous official dealings with PGC; was not involved in any departmental, policy or grant decisions, which could affect the company or its competitors; had no dealings with any competitors; and has no commercially sensitive information relevant to this appointment.

The Ministry of Defence (MOD) Business Appointments Panel raised no concerns about Sir George taking up this role. It also confirmed that PGC has no direct links to the Department; and that there is very limited opportunity for PGC to gain from his time in the Royal Navy.

The Committee's Consideration

The Committee noted that the MOD confirmed it has no direct links with PGC and that Sir George was not involved in any decisions which could affect PGC or its competitors. As such, the Committee considered there is little risk of this appointment being perceived as a reward for decisions made while in office.

The Committee concluded the risk of this appointment affording PGC an unfair advantage is low. It took into account that the MOD confirmed Sir George had no access to any relevant departmental or commercially sensitive information that could unfairly benefit PGC.

It also took into account that Sir George does not expect to have contact with Government during his role. However, the Committee considered that given some of the Pagefield group's current and past clients (international Governments and companies such as BAE), conditions should be imposed that make clear that any use of Sir George's contacts across Government/Whitehall on behalf of PGC to advantage PGC or its clients would be not be appropriate; and that he should not be involved in providing advice to PGC in relation to the UK defence market, or on bids or contracts, relating directly to the work of the UK Ministry Of Defence or its its trading funds.

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 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 office he should not become personally involved in lobbying the UK Government on behalf of Pagefield Global Counsel Ltd or its parent company, partners, subsidiaries or clients. 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 their behalf;
- for two years from his last day in Crown Service, he should not provide advice to Pagefield Global Counsel Ltd, or its parent company, partners, subsidiaries or clients in relation to the UK defence market; and
- for two years from his last day in Crown Service, he should not provide advice on the terms, or with regard to the subject matter of, a bid or contract, relating directly to the work of the UK Ministry Of Defence or its its trading funds.

By 'privileged information' we mean official information to which a Minister or Crown servant has had access as a consequence of his or her office or employment and which has not been made publicly available. Applicants are also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act or otherwise.

The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/Minister "should not engage in communication with Government (Ministers, civil servants, including special advisers, and other relevant 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 which they hold office."

I should be grateful if you would ensure that we are informed as soon as Sir George takes up this position, or if it is announced that he will do so (I enclose a form for this purpose). We

shall otherwise not be able to deal with any enquiries, since we do not release information about appointments that have not been taken up or announced, and this could lead to a false assumption being made about whether he had complied with the Rules.

I should also be grateful if you would ask that Sir George informs us if he proposes to extend or otherwise change the nature of this role as, depending on the circumstances, it may be necessary for him to make a fresh application.

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

Yours sincerely

Sarah Parkington
Committee Secretariat

