



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

Room G/08, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

8 December 2017

Air Marshall Sir Christopher Harper

Dear Sir Christopher,

You sought the Committee's advice about taking up a commission under your independent consultancy with the Estonian International Centre for Defence and Security. The Committee has now considered your application.

Commission details

You explained that you have been invited by the Estonian International Centre for Defence and Security (ICDS) - an Estonian Government funded think-tank based in Tallinn - to participate in a study to examine 'integrated air defence options' for the Baltic States. The study is academic and will inform policy decisions in the three Baltic nations. It has no commercial dimension. The study aims to:

- Characterise existing Allied and partner air defence capability in the wider Baltic Region, and air defence capability that might be deployed in times of crisis.
- Identify air defence shortfalls in peacetime and in times of crisis.
- Identify policy options for integrated air defence architectures for the Baltic region to address these shortfalls.
- Assess the advantages and disadvantages against criteria of effectiveness, cost, and policy considerations.
- Make recommendations as to 'minimal' and preferred solutions.

You told the Committee that you would be involved, during a two-week period in January 2018, in working visits to Allied capitals and NATO establishments for consultations with national government and Alliance defence and air defence policy experts. Following this, you would travel to Tallinn (in February or March 2018) to assist with the drafting of the final study reports.

The ICDS would pay a small honorarium plus expenses to your company, CH4C Global Ltd, for your involvement in this work.

You informed the Committee that the study is not planned to involve any contact with air defence experts in the UK MOD. It will, however, involve contact with senior military and civilian air defence experts in NATO.

The MOD was consulted and had no comment on your application.

The Committee's consideration

The Committee agrees that this commission is consistent with the terms of your independent consultancy, which you described as offering geopolitical and strategic consulting services in the international defence and security sector.

The Committee can see no propriety concerns associated with this work. It is a short academic study working for a think-tank funded by the Estonian Government and the work has no commercial dimension. The Committee also noted that over 16 months have passed since you left your NATO post in July 2016.

The conditions that apply to your independent consultancy are:

- A waiting period of six months from your last day in post (now expired);
- You should not draw on any privileged information available to you from your time in Crown service;
- For two years from your last day in Crown service, you should not become personally involved in lobbying the UK Government on behalf of any of your clients or those you advise;
- For 12 months from your last day of service you 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 your last day of service, before accepting any new commission you should apply to the Committee for approval to confirm that it is acceptable under the Committee's guidelines.

The Committee would expect to be informed if you propose to extend or otherwise change the nature of this commission as, depending on the circumstances, it may be necessary for you to make a fresh application.

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, the Civil Service Code or otherwise.

The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant "*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 let me know when you take up this commission, or if it is announced that you are to do so. This will enable the Committee to publish this letter and brief details on the regularly updated consolidated list on its website and in its next annual report.

Yours sincerely,

Nicola Richardson
Committee Secretariat