



## OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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### **BUSINESS APPOINTMENT APPLICATION: GENERAL SIR RICHARD BARRONS**

The Committee has been asked to consider an application from General Sir Richard Barrons, former Commander, Joint Forces Command (JFC), who proposes to set up a consultancy and accept appointments with Kellogg Brown & Root Ltd and CAE (UK) plc.

Sir Richard was Commander, JFC between 5 April 2013 and 5 April 2016. He retired from the army on 25 August 2016.

#### Application details

Sir Richard proposes to establish, with other partners, an independent consultancy called Wychwood Partners. He will offer consultancy in digital operations, innovation and strategy, spanning: data, processing, connectivity, artificial intelligence, robotics, space, bio-science, cyber, virtual reality, augmented reality and autonomy. The most likely sectors are insurance, infrastructure, oil and gas, banking and manufacturing; potentially in Europe, US and the Middle East.

He explained that the work would be commercially focused, built around emerging technology and its cyber security. It will not be engaged in any Government business. There are no specific clients identified at this stage.

Sir Richard also proposes to take up advisory appointments with the following companies:

- Kellogg Brown & Root Ltd (provider of services to the oil and gas industry, governments and defence worldwide). 2 days per month.
- CAE (UK) plc (provider of training for the civil aviation, defence and security, and healthcare

markets). 4 days per month.

For each company Sir Richard would provide advice on the global geo-strategic context, their overall business strategy, some defensive cyber aspects and the emerging implications of digital technologies across their interests. **He confirmed to the MOD that he would not be involved in contracting with the UK MOD or working in the UK Defence market while he is subject to the Business Appointment Rules. Neither does he plan to have any contact with the MOD or the UK Government for the period he is subject to the Rules.**

Sir Richard has explained that he would have spoken at many MOD/ industry related events at which these companies may have been present. He had never heard of CAE. He would have spoken to KBR audiences and met with them when he was Deputy Chief of the Defence Staff (between 2011 and 2013).

In general terms, he was involved in relevant policy development as he was engaged in the formulation and leadership of strategy and plans for the adoption of digital/4<sup>th</sup> Industrial Revolution technology in Defence, especially in information technology and cyber and the evolution of Contractor Support to Operations.

#### The Committee's consideration

When considering the application to set up an independent consultancy the Committee took into account that it will be commercially focused, with the most likely sectors to be insurance, infrastructure, oil and gas, banking and manufacturing. The Committee further noted that he is required to seek advice from the Committee for each commission that he proposes to accept.

Under the Business Appointment Rules the Committee must have regard to whether there is a risk that an employer or client may gain an unfair advantage by virtue of the contacts or privileged information held by the former Crown servant. This risk is partly mitigated in this case by the following factors:

- Sir Richard will not be involved in contracting with the UK MOD or working in the UK Defence market for the remainder of the period under which he is subject to the Business Appointment Rules.
- Sir Richard will not have any contact with the MOD or the UK Government for the same period.
- 16 months have passed since his last day in post and 12 months since his last day in Crown service. This lessens the risk of him having access to relevant and sensitive information.

The Committee must also consider whether there is a risk of any appointment being perceived as a reward for decisions made while in office. While the Committee noted that Sir Richard's responsibilities as Commander JFC included areas of relevance to the business of the companies he seeks to work for, the MOD has confirmed that he would have had no direct involvement in the management of any MOD contracts with these companies. This, together with the minimal prior contact he had with the companies and the time lapsed since his last day in office, reduces the potential for these roles to be seen as a reward.

The Committee took into account that the recommendation of the MOD Business Appointments

Panel, endorsed by the Permanent Secretary at the MOD, that the consultancy and appointments be subject to restrictions incorporated in the behavioural conditions set out below. As Sir Richard is forming a consultancy with partners and employees, the Committee would expect the consultancy as a whole to respect the conditions set out below.

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:

- 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 of service he should not become personally involved in lobbying the UK Government on behalf of the organisations to which this advice refers, their subsidiaries, partners or clients, or those he advises under his consultancy. Nor should he make use, directly or indirectly, of his Government and/or Crown Service contacts to influence policy or secure business on their behalf;
- for two years from his last day in post he should not work in or advise on the UK Defence market;
- for two years from his last day in Crown service, he should not provide 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 UK Government; and
- for two years from his last day in Crown service, before accepting any commissions and or/before extending or otherwise changing the nature of any commission, he should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of his consultancy and consider any relevant factors under the Business Appointment Rules.

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 Richard takes up these positions, 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 Richard informs us if he proposes to extend or otherwise change the nature of his roles as, depending on the circumstances, it may be necessary for him to make a fresh application.

Once the appointments have 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

Nicola Richardson  
Committee Secretariat