



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: SIR MARK LYALL GRANT KCMG

The Committee has been asked to consider an application from Sir Mark Lyall Grant, former National Security Adviser.

Application details

Sir Mark proposes to take up a position as a Senior Advisor at CTD Advisors Ltd, a company providing business management consulting.

Sir Mark informed the Committee that CTD Advisors Ltd is a London-based specialised start-up intelligence and risk management firm that advises corporate clients on doing business in emerging and high risk markets. He would be one of 3 or 4 senior advisors assisting the company to:

- Provide strategic advice to corporate clients
- Make risk management assessments of political, economic and ethical environments
- Give quality assurance of client proposals
- Assess local business information sources

He explained that this would involve attending client meetings and events, senior leadership discussions and possibly leading or participating in project implementation. The role will be part-time and paid. It is not likely to include any contact or dealings with Government.

Sir Mark said that he had no official contact with CTD Advisors Ltd or its competitors while in office and no access to commercially sensitive information about any of its competitors. This was confirmed by the Cabinet Office.

The Director General, Propriety and Ethics at the Cabinet Office, advised that she has no concerns about this appointment.

The Committee's consideration

When considering this application the Committee¹ took into account that CTD Advisors was incorporated in May 2018. Sir Mark therefore had no dealings with CTD Advisors Ltd while in office

¹ This application for advice was considered by Sir Alex Allan; Baroness Angela Browning; Lord Michael German; Terence Jagger; Dr Susan Liautaud; Richard Thomas and John Wood. Baroness Helen Liddell recused herself from this application in line with ACOBA's published Code of Practice. Jonathan Baume was unavailable.

and was not involved in any policy decisions that may have affected CTD Advisors Ltd or in awarding any contracts or grants to the company. The Committee concluded that the risk of the appointment being perceived as a reward for decisions taken in office is, therefore, low.

The Committee assessed that given the appointment is not likely to include any contact or dealings with Government and he does not have access to privileged information (over one year has passed since Sir Mark left office), it is unlikely that CTD Advisors Ltd would stand gain an unfair advantage through this appointment. The conditions set out below precluding lobbying or the direct or indirect use of contacts to benefit the company and preventing the use of privileged information, mitigate any residual risk.

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 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 Crown service, he should not become personally involved in lobbying the UK Government on behalf of CTD Advisors Ltd or its clients. Nor should he make use, directly or indirectly, of his contacts in Government to influence policy or secure business or funding on their behalf.

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/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 Mark 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 Mark informs us if he proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him to make a fresh application.

Once the 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

Nicola Richardson
Committee Secretariat