



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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**BUSINESS APPOINTMENT APPLICATION: MS CATHERINE LINDSAY RAINES**

You asked the Committee to consider an application under the Business Appointment Rules on behalf of Ms Raines, former Director General, Internal Trade and Investment, at the Department for International Trade (DIT), about taking up an appointment with the Association of Foreign Banks (AFB).

Ms Raines was DG at DIT from June 2017 to February 2018 and Previous to this she was the Chief Executive Officer at UK Trade and Investment.

**The Application**

Ms Raines sought advice on joining the Association of Foreign Banks (AFB) as CEO. Ms Raines was approached by a headhunter for this role.

The AFB is a membership organisation, which currently has approximately 200 international banking group members. According to its website, it *'...represents the interests of the foreign banking sector in the UK to industry stakeholders including the Government, regulatory bodies, and financial services organisations...'* Ms Raines described her responsibilities as CEO as: networking; information sharing; and policy formulation for foreign banks in the UK; and she said she does not expect to have contact with Government in this role.

Ms Raines said she had no official dealings with her prospective employer, or its competitors; nor did she have any contractual dealings with her prospective employer. She also confirmed that through her official duties, she has no access to commercially sensitive information.

DIT stated the AFB *'is a membership body for all major foreign banks operating in the UK but is not particularly active. DIT has limited interactions with the Association currently but acknowledge they may interact with them more frequently as part of the department's trade promotion and policy work with the Financial and Professional Services sectors.'*

DIT confirmed Ms Raines had no previous dealings with the ABF in her official capacity; and that she had no access to commercially sensitive information; and that Ms Raines left office some months ago and is likely to have limited access to unannounced policies.

DIT also acknowledges that Ms Raines had strong networks within DIT and across Government and it is likely these networks make her attractive to a prospective employer. DIT said that to safeguard against this risk, it is important that she is reminded of the restrictions around lobbying and the use of privileged information.

### **Timing of the application**

First, I would like to register the Committee's concern that this appointment was accepted and announced before completing the Government's Business Appointments process.

In this particular case, the application was submitted to the Committee shortly after Ms Raines' new role was publicly announced. The appointment was announced on Twitter by a Sky journalist, before being formally announced by the AFB on their website in a press release which includes a quote from Ms Raines; and on Ms Raines' personal LinkedIn and Twitter accounts.

DIT confirmed Ms Raines was made aware of the Business Appointment Rules and that it was in the process of reviewing her application when the leak occurred and she contacted DIT's press office when she was made aware of the tweet.

The Government's Business Appointment Rules for Civil Servants (the Rules) specify that individuals should not accept or announce a new appointment/ offer of employment before advice has been received; and that retrospective applications will not normally be accepted. In such cases the Committee is constrained from considering applications fully and freely; and in a manner that will command public confidence if an appointment has already been announced and/ or taken up.

### **Consideration**

The announcements confirmed Ms Raines' appointment at AFB and made no mention that as a senior Civil Servant, Ms Raines' is subject to the Rules and must await the advice of the Committee. Therefore, whilst the Committee recognises there was a leak in the media, the Committee remains disappointed that DIT and Ms Raines did not ensure adherence to the Rules. As you will be aware, it was not in keeping with the Rules to confirm acceptance of the appointment, without acknowledging the process that must first be completed.

In the circumstances, the Committee refuses to provide advice in this case.

However the Committee would ask the Department to bring to the attention of Ms Raines the potential risk it has raised regarding her strong networks within DIT and across Government and that it considers it likely these networks would be attractive to a prospective employer. It would of course be inappropriate for Ms Raines to use her contacts gained during her time in office, within Government/ Whitehall to influence Government on AFB's behalf.

We will publish this letter on the Committee's website, and refer to it in the relevant annual report.

Yours sincerely,

Catriona Marshall  
Committee Secretariat

