



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Sir Laurie Bristow KCMG, the Foreign, Commonwealth and Development Office, appointment with Hughes Hall, University of Cambridge

1. Sir Laurie sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown servants (the Rules) on taking up a role with Hughes Hall, University of Cambridge (the College). The material information taken into consideration by the Committee is set out in the below annex.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during Sir Laurie's time in office, alongside the information and influence a former Crown servant may offer Hughes Hall.
3. The Committee has advised that a number of conditions be imposed to mitigate the potential risks to the government associated with this appointment under the Rules; this does not imply the Committee has taken a view on the appropriateness of this appointment for a former Crown servant in any other respect.
4. The Rules¹ set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

The Committee's consideration of the risk presented

5. Sir Laurie had no dealings with Hughes Hall whilst in office, and the Foreign, Commonwealth and Development Office (FCDO) confirmed he made no

¹ Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The Queen's Regulations and the Diplomatic Service Code.

decisions specific to the College. The Committee² considered the risk of this work being offered as a reward for decisions made, or actions taken in office, as low.

6. Though this appointment has no direct overlap with Sir Laurie's time in office, he may have access to privileged information which may be seen to be of general use to any organisation. However, the risk associated with his access to information is limited and he has an ongoing duty of confidentiality.
7. There is a risk associated with Sir Laurie's influence should his employer be seen to make improper use of his privileged network gained as a result of his time in office.

The Committee's advice

8. The risks above are limited given there is no direct overlap with Sir Laurie's responsibilities in office. The conditions below prevent him from making use of the information and contacts gained in office to the unfair advantage of Hughes Hall.
9. Although this application has been submitted before Sir Laurie has left office, the Committee is prepared to provide advice now. However, the Committee wishes to make clear its recommendation is made on the basis of the information provided. If Sir Laurie should become aware of any circumstances that would be relevant to his application and this advice, in the gap between receiving this advice and taking up this role, he should revert to the Committee for further advice.
10. The Committee advises, under the government's Business Appointment Rules, that Sir Laurie's appointment with **Hughes Hall, University of Cambridge** be subject to the following conditions:
 - he should not draw on (disclose or use for the benefit of himself or the persons or 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 in Crown service, he should not become personally involved in lobbying the UK government on behalf of Hughes Hall, University of Cambridge (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Hughes Hall, University of Cambridge (including parent companies, subsidiaries, partners and clients);
 - for two years from his last day in Crown service, he should not provide advice to Hughes Hall, University of Cambridge (including parent

² This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Isabel Doverty; Sarah de Gay; Dr Susan Liautaud; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir; and Lord Larry Whitty.

companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the UK government; and

- for two years from his last day in Crown service, he should not become personally involved in lobbying contacts he has developed during his time in office in external organisations (including other governments) for the purpose of securing business for Hughes Hall, University of Cambridge (including parent companies, subsidiaries and partners).
11. The advice and the conditions under the government's Business Appointment Rules relate to Sir Laurie's previous role in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. It is an applicant's personal responsibility to understand any other rules and regulations you may be subject to in parallel with this Committee's advice.
 12. 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.
 13. 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*'.
 14. I should be grateful if you would inform us as soon as Sir Laurie takes up employment with this organisation, or if it is announced that he will do so by emailing the office at the above address. 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. This could lead to a false assumption being made about whether Sir Laurie has complied with the Rules.
 15. Please also inform us if Sir Laurie 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 where appropriate, refer to it in the relevant annual report.

Yours Sincerely,

William Young
Committee Secretariat

Annex - Material information

The role

1. Sir Laurie's roles at FCDO include:
 - Project work relating to Russia/Ukraine crisis since January 2022 (Sir Laurie is due to leave FCDO in August or September)
 - Her Majesty's Ambassador to Afghanistan from June to November 2021
 - Pre-posting and Head, Afghanistan Transition Task Force from January to June 2021
 - COP26 Regional Ambassador from March to December 2020
2. Sir Laurie said he has been offered a paid, full-time appointment with Hughes Hall as President.
3. Hughes Hall is a college of the University of Cambridge. Its website says it has more than 50 Governing Body Fellows, over 200 Senior Members, and around 900 postgraduates and undergraduates from more than 80 countries. The College's website says it has particular strengths in the five following subject areas, broadly in the Sciences and Social Sciences: Physical Sciences, Engineering and Mathematics; Life Sciences; Business and Economics; Education and Social Sciences; and Law. The website says Hughes Hall is one of the most international colleges, bridging the academic and external worlds, with an open and informal atmosphere.
4. Sir Laurie described his duties as leading Hughes Hall and representing it externally, with partners and benefactors, and within the University. The College's website describes the role of president as providing '*...overall leadership to the College*'.

Dealings in office

5. Sir Laurie advised the Committee he did not meet with Hughes Hall whilst in office. He said he did not have any involvement in any policy development or decisions that would have been specific to Hughes Hall, and held no commercial or contractual responsibilities relating to the College.

Department Assessment

6. FCDO confirmed the details Sir Laurie provided.
7. FCDO said it has no reservations about this appointment and there is no reason to think that it is improper. The department recommended the standard conditions.