



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Peter Hill CB CVO, former CEO of COP 26, the Cabinet Office. Application to establish an independent consultancy with a business partner.

1. Mr Peter Hill, former CEO of COP 26 at the Cabinet Office, 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 his proposal to establish an independent consultancy alongside a business partner. The material information taken into consideration by the Committee is set out in the 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 Mr Hill's time in office, alongside the information and influence a former CEO of COP26 may offer this consultancy and its future clients.
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 is not an endorsement of this appointment 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. Mr Hill proposes to set up a consultancy with The Rt Hon the Lord Barwell called NorthStar Advisory. This will focus on providing geopolitical risk and insight advisory services on a range of political, economic and geopolitical issues to the CEO's, Boards and senior staff in a range of sectors. He said this would mean advising on geopolitics and economics, including the UK, European and US regions through a weekly newsletter and regular briefings to board members and clients. Mr Hill said that although COP would not be a central part of the company's work, he would also expect to advise clients on UK and international climate and energy issues.

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

6. This will be a newly established consultancy. However, there are clients that are already engaged with Lord Barwell that may engage this new entity and work with Mr Hill, including PWC. Mr Hill noted that in 2021 PWC successfully bid for and completed a contract with COP26 and the Cabinet Office to carry out a study assessing the economic benefits to the UK, in particular Scotland, of hosting COP26. Mr Hill said this was based on information that was in the public domain and he had no role in the award or management of the contract. He also noted this was unrelated to climate policy or the negotiations. As PWC have already engaged Lord Barwell, the Committee considered the risk this work could reasonably be perceived as a reward for decisions or actions Mr Hill took in office is low.
7. It would not be improper for Mr Hill to set up and operate a consultancy which draws on generic skills and experience he gained from his time in Crown service. The potential risks are hard to quantify given the broad and wide ranging nature of the consultancy and that clients are as yet unknown. Given his former role, he will have had sight of a wide range of information on climate change and energy - which may be perceived to offer insight unavailable to the consultancy's competitors. However, the Committee agreed with the Cabinet Office that there are a number of mitigating factors that limit the risks associated with his access to information.
8. Mr Hill's role was limited to international climate negotiations - limiting his access to insight and privileged information. Mr Hill was not involved in developing UK energy or climate policy. Rather he worked with other countries on matters already in the public domain. His role was focussed on navigating UN processes to drive toward Net Zero globally based on the UK's already agreed policy in this area (which is the responsibility of another department, the department for Business, Energy and Industrial Strategy). The Cabinet Office and Mr Hill confirmed that the UK's domestic policy driving COP 26 and COP 27, and the agreements made at COP26 and COP27, are in the public domain.
9. There is a risk associated with Mr Hill's potential influence, should he and/or the consultancy be seen to make improper use of his privileged network of contacts within government. There is also a risk associated with Mr Hill's network of contacts in other governments given his role in international negotiations.

The Committee's advice

10. The Committee² agreed with the Cabinet Office that although there may be some overlap with the subject matter of his advice, and his work in office - the risks under the Rules are limited. In the circumstances, it determined the risks identified in this application can be appropriately mitigated by a number of conditions below. Mr Hill must not make use of privileged information, contacts or influence gained from his time in Crown service to the unfair advantage of this consultancy or the clients it works with.
11. Additionally, as the clients Mr Hill will work are not all known, the Committee needs to mitigate the risk associated with that. Although Mr Hill's role was not responsible for making policy decisions, he was privy to a breadth of information and may have stepped into some issues in depth when negotiating. The Committee has imposed a condition which makes it clear that Mr Hill should not advise on work that arises where it relates to matters he had a material role in developing or determining during his time

² The application for this advice was considered by Jonathan Baume; Andrew Cumpsty; Isabel Doherty; The Rt Hon Lord Eric Pickles; Richard Thomas; and Mike Weir. Sarah de Gay was unavailable.

as CEO of COP26.

12. All potential clients must be notified of this advice, and when seeking work/new clients, Mr Hill must adhere to the conditions below. Under the government's Business Appointment Rules, the Committee advises that his work under this **independent consultancy (NorthStar Advisory)** should 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 and its arm's length bodies on behalf of those he advises under the independent consultancy (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage those he advises under the independent consultancy (including parent companies, subsidiaries, partners and clients);
 - for two years from his last day in Crown service, he should not provide advice to on behalf of those he advises under the independent consultancy (including parent 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 or any of its arm's length bodies;
 - for two years from her 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 this consultancy or its clients (including parent companies, subsidiaries and partners); and
 - for two years from his last day in Crown service, he should not advise this independent consultancy or its clients on work with regard to any policy which he had a material role in developing or determining as Director General, Domestic and Economic Affairs, Cabinet Secretariat at the Cabinet Office, or where he had a relationship with the company or organisation.
13. The advice and the conditions under the government's Business Appointment Rules relate to an individual'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 individual's responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.
14. 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.
15. 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’.

16. Mr Hill must inform us as soon as this consultancy is live or announced. You must also inform us if he proposes to extend or otherwise change the nature of his consultancy as, depending on the circumstances, it may be necessary for him to make a fresh application.
17. Once this has been publicly announced or set up, we will publish this letter on the Committee’s website, and where appropriate, refer to it in the relevant annual report.

Yours sincerely,

Cat Marshall
Committee Secretariat

Annex - Material information

The role and dealings in office

1. Mr Hill said he wishes to join Lord Barwell to form an independent consultancy likely to be called NorthStar Advisory. He said this will focus on providing geopolitical risk and insight advisory services on a range of political, economic and geopolitical issues to CEO’s, Boards and senior staff in a range of sectors. He said this would mean advising on geopolitics and economics in the UK, European and US regions through a weekly newsletter and regular briefings to board members and clients. Mr Hill said that although COP would not be a central part of the company’s work, he would also expect to advise clients on UK and international climate and energy issues.
2. Lord Barwell has an established list of clients that he may work with (including PWC, DLA Piper, Arcadis, Barratt Homes and Canopus)³. Mr Hill confirmed there would be no representation of clients (lobbying or otherwise) to government - and he understands the lobbying restriction that applies. Mr Hill confirmed PWC is the client he is most likely to work with, at least initially.
3. Mr Hill’s view was that the kind of advice he is planning to provide does not present any conflict: ‘... *given the reach of climate into almost every aspect of commercial activity, to exclude climate from the issues I could advise on would be untenable*’. He said that the policy aspect of the UK’s COP 26 presidency did not seek to make any commitments that would change domestic policy. Rather, domestic policy (which sat outside of his department) drove the commitments made at COP26 and COP27.
4. Mr Hill said he is not involved in or sighted on discussions about, decision making on or policy development of UK domestic climate or energy plans - including UK oil and gas licensing; fracking; nuclear policy; renewables policy; hydrogen or CCUS policy; land management or agricultural policy; nature or forests policy; zero emission

³ Lord Barwell previously received advice on a consultancy and number of clients, including PWC, DLA Piper, Arcadis, Barratt Homes - <https://www.gov.uk/government/publications/barwell-gavin-chief-of-staff-to-the-prime-minister-acoba-advice>

vehicle policy, industrial decarbonisation etc. Mr Hill also noted that all negotiating and policy issues (based on agreed domestic policy) associated with COP27 will conclude before the unit is disbanded in December 2022.

5. In relation to PWC, Mr Hill confirmed that in 2021 the company successfully bid for and completed a contract with COP26 and the Cabinet Office to carry out a study assessing the economic benefits to the UK, in particular Scotland, of hosting COP26. PH said this was based on information that was in the public domain.
6. Mr Hill noted there were 7 Directors covering Events, Security, Negotiations, International Engagement, Partnerships, Communications and Strategy. He said the Director for Partnerships handled the process of sponsors and contracts for COP26 and he was not involved in the hiring process of commercial partners or sponsors. As such, he had no role in the deliberations or the award of the contract to PWC and he did not have any contact about the work with PWC before or after the contract was awarded. The management of the PWC contract was held by the Director of Partnerships for COP. Mr Hill said that he *'...can see no case for restricting my future work with PWC based on this contract which had nothing to do with climate-related policies or negotiations; and was purely an assessment of the economic benefits of holding an event.'*

Department Assessment

7. The Cabinet Office confirmed the details of Mr Hill's application.
8. The Cabinet Office noted that Mr Hill's recent role related exclusively to international climate negotiations in COP26 and COP27 and had no involvement in relation to UK domestic, climate or energy plans. It confirmed PH was exclusively involved in international climate negotiations in the past 3 years. The department therefore confirmed Mr Hill had no access to policy, nor information about competitors which could give rise to the perception of unfair advantage. As a result, the Cabinet Office was also of the view there was little risk attached to clients of this consultancy.