



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Sir Charles Roxburgh KCB, former Second Permanent Secretary at His Majesty's Treasury (HMT). Paid application to work with Equilibrium Gulf under his independent consultancy.

1. You 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 your proposal to work with Equilibrium Gulf under your independent consultancy.
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during your time in office, alongside the information and influence you may offer Equilibrium Gulf. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
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. The Committee² considered this commission to be consistent with the description of your consultancy which you described as focusing on potential financial services clients in both the UK and the US. The consultancy will advise senior leaders including Chief Executives, Chairs and Boards on strategic or

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.

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

organisational issues - on matters such as corporate or business unit strategy, top level organisational structure and effectiveness, and strategic risk management.

6. You did not meet with the Kingdom of Bahrain or with Equilibrium Gulf nor did you make any decisions specific to the company during your time as Second Permanent Secretary at HMT. Therefore, the Committee considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
7. Given your former role as Second Permanent Secretary, you will have had oversight of a wide range of information and policy that may provide an unfair advantage to a broad range of organisations. The Committee took into account there are a number of mitigating factors that help to reduce the risks associated with your access to information and insight that may be seen to offer Equilibrium an unfair advantage:
 - HMT previously advised the Committee any policy matters you were involved in will have moved on within 6 months of your last day in Crown service - not least as a result of there being significant changes in the Prime Ministers, Chancellor of the Exchequer and the Cabinet in September and October, after you left government in June 2022
 - 12 months have now passed since you had access to sensitive information at HMT; and
 - You are prevented from drawing on privileged information and have an ongoing duty of confidentiality.
8. Given your role at the very centre of HMT, there are risks attached to your potential to offer unfair influence or access to government. The Committee considered there was a risk you will be seen to have influence within government that may assist Equilibrium or its client unfairly.

The Committee's advice

9. The Committee determined the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear you cannot make use of your access to privileged information, contacts or influence gained from your time in government to unfairly assist Equilibrium or its client unfairly.
10. This advice provides you with consent to continue Equilibrium's work with the Government of Bahrain - it does not give you consent in relation to any possible future clients.
11. In the circumstances, the Committee's advice in accordance with the government's Business Appointment Rules is that this work with Equilibrium Gulf should be made subject to the same conditions attached to your independent consultancy:
 - you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available

to you from your time in Crown service;

- for two years from your last day in Crown service, you should not become personally involved in lobbying the UK government and its arm's length bodies on behalf of those you advise under your independent consultancy (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage those you advise under your independent consultancy (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in Crown service, you should not provide advice to on behalf of those you advise under your 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; and
 - for two years from your last day in Crown service, before accepting any commissions for your independent consultancy and or/before extending or otherwise changing the nature of your commissions, you should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.
12. The advice and the conditions under the government's Business Appointment Rules relate to your 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.
13. 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.
14. 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*'.
15. You must inform us as soon as your appointment is live or is announced. You must also inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.

16. Once this appointment 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,

Isabella Wynn
Committee Secretariat

Annex - Material information

The role

1. You said Equilibrium Gulf is a Geo-strategic advisory company, providing eminent and senior advisors to governments – helping government govern better. You stated it has a standing contract with the Economic Development Board (EDB) of the Kingdom of Bahrain to provide an international Advisory Board (IAB), consisting of several eminent and senior IAB members, to advise the Government of Bahrain on a range of pan sector issues, predominantly economic. Recently, Equilibrium's advisors have been focused on Bahrain's post-Covid economic recovery plan.
2. You said your responsibilities will be joining the board to bring expertise on international economics and financial services. You also said your role will not include contact with government.

Dealings in office

3. You advised the Committee that you did not meet with the Government of Bahrain or Equilibrium Gulf whilst in office. Further, you said you did not have any involvement in any policy development or decisions that would have been specific to Equilibrium Gulf; had no relevant commercial or contractual responsibilities; nor access to sensitive information.

Department Assessment

4. HMT provided its views on this application, confirming the details you provided and stated you had no access to information that could provide an unfair advantage to Equilibrium Gulf or the Bahraini Government.
5. HMT stated it had no concerns with this appointment and recommended the standard conditions.
6. The FCDO was previously consulted as Equilibrium's current client is the Government of Bahrain. It stated it was aware of the work and had a long standing relationship with the company. FCDO said: *'Equilibrium's role here is to support Bahrain's modernisation and reform efforts through providing*

expert advice, consultancies and contacts, which often complements work that the Embassy is engaged in. We are in touch with Equilibrium on a fairly regular basis.'