



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

Room G/08, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

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BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: Sir Laurie Bristow KCMG, former Strategic Adviser at the Foreign, Commonwealth and Development Office (FCDO). Unpaid appointment with the Cambridge Commonwealth, European & International Trust (Cambridge Trust).

1. Sir Laurie sought advice from the Advisory Committee on Business Appointments (the Committee) under the Government's Business Appointment Rules for former Crown Servants (the Rules) on an unpaid role he wishes to take up with the Cambridge Trust.
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 Sir Laurie's time in office, alongside the information and influence a former Crown servant may offer the Cambridge Trust. 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 risks presented

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

5. When considering this application, the Committee² took into account this appointment as Trustee is unpaid³. Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of government by considering the real and perceived risks associated with former ministers joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions or take action in office to in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. This work has limited overlap with Sir Laurie's area of work in government as Strategic Advisor. The FCDO stated he will have had some access to information on the Chevening Scholarships and funding bodies which are relevant to the work for the Trust. However, the unpaid nature of this appointment and the standard conditions below limit the real and perceived risk of him making improper use of information he had access to while in office for his personal benefit.

The Committee's advice

7. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. Whilst there are inherent risks associated with Sir Laurie's access to sensitive information and contacts, the standard conditions below, which seek to prevent him from drawing on his privileged information and using his contacts to the unfair advantage of his new employer, will sufficiently mitigate in this case.
8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **Cambridge Commonwealth, European & International Trust** 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 or any of its arm's length bodies on behalf of the Cambridge Commonwealth, European & International Trust (including parent companies, subsidiaries, partners and clients); nor

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

³By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

should he make use, directly or indirectly, of his contacts in the government and/or ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage the Cambridge Commonwealth, European & International Trust (including parent companies, subsidiaries, partners and clients);

- for two years from his last day in Crown service, he should not provide advice to the Cambridge Commonwealth, European & International Trust on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of the UK government or any of its arm's length bodies.
9. The advice and the conditions under the government's Business Appointment Rules relate to an applicant'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 they may be subject to in parallel with this Committee's advice.
 10. 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 Ministerial Code/Civil Service Code or otherwise.
 11. 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.*"
 12. Sir Laurie must inform us as soon as he takes up this work or if it is announced that he will do so. Similarly, he must inform us if he proposes to extend or otherwise change his role with the organisation as depending on the circumstances, it might be necessary for him to seek fresh advice.
 13. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Hamzah Rizvi
Committee Secretariat

Annex - Material information

The role

1. Sir Laurie stated he will be working in an unpaid role as Trustee with the Cambridge Trust - a charity established by the University of Cambridge. The Cambridge Trust provides scholarships to international students for their studies at Cambridge University.
2. He said the role of the Trustees is to govern the Trust, working with the Director and her staff to ensure that the Trust meets its charitable objectives and complies with relevant legislation and will not have contact with government as part of his role.
3. Sir Laurie said that Trustees of the charity usually include a number of heads of the colleges and senior academics. Sir Laurie previously received advice and took up a role as President of Hughes Hall at Cambridge University and was invited to apply by virtue of his existing role⁴.

Dealings in office

4. Sir Laurie advised the Committee that he did not meet with, nor was he involved in any impact on policy or regulatory decisions specific to the Cambridge Trust.

Departmental Assessment

5. The FCDO confirmed the details Sir Laurie provided in his application and stated that:
 - he did not make any policy or regulatory decisions specific to the Cambridge Trust;
 - it has a departmental relationship with the Cambridge Trust - the organisation works in partnership with Chevening Scholarships⁵ and with the GREAT campaign⁶;
 - Sir Laurie will have had access to information on the Chevening Scholarships and government funding bodies which is relevant to the work for the Trust which exists to provide financial support to overseas students studying for degrees at Cambridge though noted the nature of the role and organisation is a mitigating factor; and

⁴ <https://www.gov.uk/government/publications/bristow-laurie-her-majestys-ambassador-to-afghanistan-foreign-commonwealth-and-development-office-acoba-advice/advice-letter-sir-laurie-bristow-president-of-hughes-hall-university-of-cambridge>

⁵ The Chevening Scholarship is an international scholarship, funded by the British Foreign and Commonwealth Office, that lets foreign students with leadership qualities study at universities in the United Kingdom.

⁶ The GREAT Britain and Northern Ireland campaign is the UK's international brand marketing campaign, which works closely with UK businesses, not-for-profit organisations and high-profile figures to promote the best of the UK abroad.

- it did not have concerns with the appointment and recommended the standard conditions.