



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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**BUSINESS APPOINTMENT APPLICATION: The Rt Hon Sir Gavin Williamson
CBE MP, former Minister without Portfolio and Secretary of State for
Education. Paid appointment with Lanistar Limited (Lanistar)**

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) on an appointment you wish to take up with Lanistar as Advisory Board Member.
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 Lanistar. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's¹ 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 Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

¹ This application for advice was considered by: Sarah de Gay; The Rt Hon Lord Pickles; Mike Weir; The Baroness Jones of Whitchurch; Andrew Cumpsty; and Isabel Doverty.

The Committee's consideration of the risks presented

5. Your former departments confirmed you had no engagement with, nor made any decisions specific to Lanistar in office. As such, the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
6. As a former minister you had access to privileged information. There are mitigating factors that reduce the risks associated. There is no direct overlap between your responsibilities in office and the proposed appointment; and you have not had access to information at the Department for Education for two years and at the Cabinet Office for 10 months. These mitigating factors limit the real and perceived risk the information you possess could give Lanistar an unfair advantage.
7. In the description of your role, you said that you would provide connections to Lanistar. You also made clear you would have no contact or dealings with government.
8. There is a risk your connections could be used to unfairly access and influence the government and its arm's length bodies. Making use of contacts within government even indirectly would be a breach of the Rules which impose a lobbying ban on all ministers for 2 years on leaving office.

The Committee's advice

9. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Rules, subject to 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 ministerial office to the unfair benefit of Lanistar - whether directly or indirectly.
10. The Committee advises, under the government's Business Appointment Rules, that your role with **Lanistar Limited** should be subject to the following conditions:
 - 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 ministerial office;
 - for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of Lanistar Limited (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your

contacts in the government and/or ministerial office to influence policy, secure business/funding or otherwise unfairly advantage Lanistar Limited (including parent companies, subsidiaries, partners and clients); and

- for two years from your last day in ministerial office, you should not provide advice to Lanistar Limited (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.
11. 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/House of Lords Commissioners for Standards. It is an individual's personal responsibility to understand any other rules and regulations they 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.*" This Rule is separate and not a replacement for the Rules in the House.
 14. You must inform us as soon as you take up this role, or if it is announced that you will do so. 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.
 15. 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.

The Rt Hon Lord Pickles

Annex - Material Information

The role

1. Lanistar is a fin-tech company providing payment cards and banking services.
2. You informed the Committee that your role as a Advisory Board Member with Lanistar would entail:
 - a. Providing guidance, connections (with financial institutions) and leadership to Lanistar
 - b. Attending Advisory Board meetings throughout the year
 - c. As appropriate, contributing content and input to pitch decks produced for potential investors, press releases and related case studies and, if available, attend investor meetings to help promote Lanistar
 - d. Contributing ideas and views relating to the strategy and priorities of the business
 - e. Advising on governance and internal expansion and development.
3. You also confirmed you will not have any contact with government in this role.

Dealings in office

4. You confirmed you had had no official contact with Lanistar when you were Minister without Portfolio at the Cabinet Office and Secretary of State for Education. You confirmed you:
 - did not make decisions specific to Lanistar;
 - do not have access to sensitive information that would provide an unfair advantage;
 - had no commercial or contractual responsibilities relating to the Lanistar; and
 - did not meet with competitors of Lanistar nor have access to sensitive information regarding competitors.

Department Assessment

5. The Cabinet Office and Department for Education confirmed the details you provided and recommended the standard conditions be applied.