



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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**BUSINESS APPOINTMENT APPLICATION: General Sir Mark Alexander Popham Carleton-Smith GCB, CBE (Gen Sir Mark), former Chief of the General Staff. Paid appointment with SafeLane International Group.**

1. Gen Sir Mark 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 taking up a role with SafeLane Global International (SafeLane) as a Non Executive Director.
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 Gen Sir Mark's time in office, alongside the information and influence he may offer SafeLane. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee considered whether this appointment was unsuitable given this is a company that operates in the defence sector and his former role as Chief of the General Staff. The Committee must also consider the information provided by the department. The Committee has imposed a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules. The Committee's advice is not an endorsement of the appointment.
4. The Rules 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. Whilst there is no direct contractual relationship between the Ministry of Defence (the MOD) and Safelane, the Committee<sup>1</sup> was made aware the Army has one contract, with SafeLane Global, the parent company of the organisation Gen Sir Mark seeks to join.
6. Gen Sir Mark did not meet with either company whilst in government service and the MOD said he was not involved in any specific decisions regarding the company- including the relatively small contract that exists with the parent company. Gen Sir Mark's overall responsibility as Head of the Army is relevant here, though there is no evidence that this role was offered as a reward for decisions made or actions taken whilst he was in office.
7. As former Chief of the General Staff at the MOD, Gen Sir Mark would have had access to privileged information about the defence sector both in the UK and internationally which could benefit any company he chooses to join - particularly in the defence sector. The Committee agreed with the MOD given Gen Sir Mark left his role and last had access to information at the MOD 17 months ago, this reduces the risk. Given his broad access to information and significant insight into the UK MOD, there remains a risk, which is most likely to arise if he was to work on UK defence matters. It is therefore significant that this role is proposed will be internationally focused outside of the UK.
8. The former Chief of the General Staff will have a network of contacts at the highest levels of government, the MOD and externally within defence and other governments. There is a risk these contacts could offer unfair access to the company, unavailable to its competitors. It is relevant that Gen Sir Mark will not have any contact or dealings with government, and will be focussed on business outside of the UK.
9. It is significant that SafeLane wrote to the Committee confirming it will ensure Sir Mark and the company abide by the Committee's advice noting the *'executive directors of SafeLane Global International Ltd will receive written instructions from the board ordering them to abide by these conditions'*.

## The Committee's advice

10. SafeLane will undoubtedly gain from Gen Sir Mark's skills and experience in defence. The risks in relation to his access to information and influence are most likely to arise should he work on matters related to the UK defence

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

market. Further, the company has a commercial interest in the UK government and the MOD's policy and operations. If Gen Sir Mark was to have any contact with the UK government in this role, it would be difficult to manage the risk he would be seen to be offering unfair access and influence. The Committee has therefore imposed a condition within the role to prevent him from advising on the UK defence market and having any contact with the UK government. This is in keeping with the role as described.

11. The remaining risks relating to Gen Sir Mark's privileged access to information and wider network which may offer unfair influence are appropriately mitigated by conditions below.

12. The Committee advises, under the Government's Business Appointment Rules, that his role with **SafeLane Global International** 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 or any of its arm's length bodies on behalf of SafeLane Global International (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 SafeLane Global International (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service, he should not provide advice to SafeLane Global International (including parent companies, subsidiaries, partners and clients) 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 and its arm's length Bodies - including the Ministry of Defence or its trading funds;
- for two years from his last day in Crown service, he should not advise SafeLane Global International on the UK defence market; nor have any direct engagement with the UK government.
- 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 and/or its militaries) for the purpose of securing business for SafeLane Global International (including parent companies, subsidiaries and partners).

13. 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.
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. You must inform us as soon as Gen Sir Mark takes up employment with this organisation, or if it is announced that he will do so. Please also inform us if Gen Sir Mark 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.
17. 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,

Xante Chalwell  
**Committee Secretariat**

## **Annex - Material information**

### The role

1. Solix Group AB<sup>2</sup> is a Swedish private equity firm which is the holding company of SafeLane Global. SafeLane Global<sup>3</sup> has a contractual relationship with the UK Army. SafeLane Global International<sup>4</sup> (SafeLane) is a newly established (in June 2023 according Companies House) subsidiary of SafeLane Global which Gen Sir Mark is joining and does not have a contractual relationship with MOD. Its operations are focused internationally.
2. Gen Sir Mark said Safelane is a global demining and explosive ordnance disposal business. The website states that Safelane provides clearance of landmines and explosive remnants of war (ERW) including unexploded ordnance (UXO) - on land and in water.
3. Gen Sir Mark wishes to take up a paid, part-time role as a Non-Executive Director of the Board which is internally focused. There will be no contact or dealings with the UK government.

### Dealings in office

4. Gen Sir Mark did not have any contact with SafeLane during his time in office. Though it is a defence related company, he said he did not consider he made any decisions specific to the company in office. Nor does he have access to any information of particular relevance to SafeLane.

### Department Assessment

5. The MOD confirmed the details provided by Gen Sir Mark.
6. The MOD said it does not have a relationship with SafeLane Global International (referred to as SafeLane above), but confirmed it does have one relatively small contract with its parent company, SafeLane Global, worth £500k with the Army.

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<sup>2</sup> <https://solixgroup.com/eng/#>

<sup>3</sup> <https://find-and-update.company-information.service.gov.uk/company/03431843>

<sup>4</sup> <https://find-and-update.company-information.service.gov.uk/company/14937468>

7. The MOD said that whilst Gen Sir Mark was head of the army, he did not make decisions specific to this company - it also confirmed that he had no involvement in the contract; and no official dealings with the company.
8. The MOD considered Gen Sir Mark he will significantly have insight and influence as a result of his former role. Though it was unaware of any specific information that would offer an unfair access and considered the international focus of this role as a large mitigating factor.
9. The MOD recommended restrictions on his use of contacts developed during his time as Chief of the General Staff to mitigate the risk of perception that his contacts and insight gained in office, that could be used to give Safelane Global international undue advantage. It also recommended a limitation to the role, preventing Sir Mark from advising SafeLane Global International or its related companies on the UK market for capabilities he was responsible for requirement setting as Chief of the General Staff.
10. The Chairman of Safelane Global International and wrote to the Committee and said the following:

*'The board of SafeLane Global International Ltd of which I am the Chairman, confirms that it will ensure that Sir Mark and SafeLane Global International Ltd abide by the conditions laid out in your email.'*

*Sir Mark and the executive directors of SafeLane Global International Ltd will receive written instructions from the board ordering them to abide by these conditions and never in any circumstances attempt to ignore or bypass them. We take our responsibilities as a board extremely seriously and would point out that we have a former Prime Minister of Denmark (Madame Helle Thorning-Schmidt) on the board as a non-executive director and so are well aware of the importance of demonstrating that a former Government employee's work does not give our company an unfair advantage in any way.'*