



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Sir Stephen Lovegrove KCB, former Defence Industrial Adviser to the Prime Minister & National Security Adviser in the Cabinet Office. Paid application with the School of International and Public Affairs, Columbia University.

1. Sir Stephen 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 taking up a role with the School of International and Public Affairs (SIPA), Columbia University.
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 his time in office, alongside the information and influence he may offer Columbia University. 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.

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

The Committee's Consideration

5. The Committee² noted Sir Stephen was not involved in any decisions specific to Columbia University whilst he was in office, nor is there a relationship between the institution and the Cabinet Office. Therefore, the Committee considered there is limited risk that this appointment can reasonably be perceived as a reward for decisions made in office.
6. There are inherent risks in all applications at this level, as Sir Stephen would have access to sensitive information which may be seen to benefit any organisation he chooses to join. The nature of the organisation is a significant mitigating factor, he is joining a university in an academic, not commercial capacity. Further, 6 months have now passed since he was in government.
7. As the former Defence Industrial Adviser to the Prime Minister and National Security Adviser, there are inherent risks associated with Sir Stephen's influence and network of contacts within government which could unfairly assist SIPA. He stated his intended role will not involve any contact with the UK government.

The Committee's advice

8. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. The standard conditions below, prevent Sir Stephen from drawing on his privileged information and contacts to the unfair advantage of Columbia University, and will sufficiently mitigate the risks in this case.
9. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **School of International and Public Affairs, Columbia University** 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 the School of International and Public Affairs, Columbia University (including parent companies, subsidiaries, partners, clients and members); nor should he make use, directly or indirectly, of his contacts in the

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

government and or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage the School of International and Public Affairs, Columbia University (including parent companies, subsidiaries, partners, clients and members); and

- for two years from his last day in Crown service, he should not provide advice to the School of International and Public Affairs, Columbia University (including parent companies, subsidiaries, partners, clients and members) 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.
10. 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.
 11. 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.
 12. 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.*"
 13. Sir Stephen must inform us as soon as he takes up or announces this work. He must also inform us if he proposes to extend or otherwise change the nature of his work as, depending on the circumstances, it may be necessary for him to make a fresh application.
 14. 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,
Hamzah Rizvi
Committee Secretariat

Annex - Material Information

The role

1. The School of International and Public Affairs (SIPA), Columbia University is a higher education institution based in New York City, New York.
2. Sir Stephen said that in his paid, part-time role as Distinguished Visiting Fellow, he will primarily operate in the academic areas of Energy Security and Geopolitics, which will involve some teaching of graduate students and participating in seminars etc. He said does not propose to use it as a platform for writing.
3. Sir Stephen stated his role does not include contact with government.
4. Sir Stephen stated he was offered the role by Jason Bordoff, the Professor of Professional Practice in International and Public Affairs at Columbia University.

Dealings in office

5. Sir Stephen advised the Committee that he did not make any policy or regulatory decisions specific to Columbia University, nor did he meet them whilst in office.

Departmental Assessment

6. The Cabinet Office confirmed Sir Stephen did not make any decisions specific to SIPA and there is no departmental relationship with Columbia University.
7. The Cabinet Office confirmed Sir Stephen spoke at the Centre on Global Energy Policy during a conference co-hosted by SIPA and the Royal United Services Institute (RUSI) in London in April 2015, and interacted with a professor at SIPA at a strategic speech in the same month. Both Sir Stephenn

and the professor attended the same conference as part of IHS Energy CERAWeek³ in April 2015.

8. The Cabinet Office said Sir Stephen would have had access to a wide range of departmental policy and insight that could give organisations an unfair advantage, but did not have any concerns regarding his access to sensitive information relevant to his appointment to join Columbia University.
9. The Cabinet Office noted the condition to maintain the confidentiality of sensitive information gained in the course of Sir Stephen's time in service should act to mitigate the divulgence of the most sensitive information.
10. The Cabinet Office also noted that the nature of the organisation he is joining is a mitigating factor - being that his proposed role is a Visiting Professor, rather than providing advice on the running of the organisations and it is a US-based university. As such, there is little chance of Columbia University gaining an unfair advantage from their work with Sir Stephen.
11. The Cabinet Office did not have any concerns with the appointment and recommended the standard conditions.

³ CERAWeek is an annual energy conference organised by the information and insights company S&P Global in Houston, Texas.