



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

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

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BUSINESS APPOINTMENT APPLICATION: General Sir Tim Radford KCB (CB) DSO OBE (MBE), former Deputy Supreme Allied Commander Europe (DSACEUR) in NATO. Paid appointment with the Cohen Group

1. General Sir Tim 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 his proposal to work with the Cohen Group.
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 General Sir Tim made during his time in office, alongside the information and influence he may offer the Cohen Group. 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 General Sir Tim's former role as Deputy Supreme Allied Commander Europe (DSACEUR) in NATO and the Cohen Group's work within the defence market. The Committee must also consider the information provided by his former departments about his specific dealings with this employer and the sector.
4. The Committee has advised that a number of conditions and a waiting period be imposed to mitigate the potential risks to the government associated with this appointment under the Rules. The Committee's advice is not an endorsement of the appointment.

5. 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

6. The Cohen Group is a US-based global consulting service firm that provides strategic advice in almost every market - including the aerospace and defence sectors. General Sir Tim had one meeting with the Cohen Group just before he left office, to explain NATO's transformation strategy. The MOD and NATO confirmed there is no other relationship, commercial or otherwise. Further, General Sir Tim made no decisions specific to the company, in relation to this meeting or otherwise. The Committee² therefore considered the risk this role could reasonably be perceived as a reward for decisions made or actions taken whilst at NATO as low.
7. Though the Cohen Group is not a defence company, it operates within the defence sector globally. As DSACEUR at NATO, General Sir Tim would have had access to sensitive information on defence and security which could benefit a range of organisations. In particular he has had a key role in modernising NATO and setting the strategy for it to succeed in the face of current and future challenges. General Sir Tim has not had access to information or MOD/NATO work since he left his role in July 2023 and he will not formally leave Crown service until January 2024. He is also subject to a three month wait which would put 9 months between him having had any access to information and taking up this post. It is also relevant that alongside his ongoing duty of confidentiality, his role is internally focussed and not specific to defence.
8. There is also a risk associated with the wide range of contacts that General Sir Tim would have amassed during his time in office, in the UK and beyond. In particular, given he intends to provide insight and counsel on engagement with government officials internationally, there is a risk he could be seen to offer unfair access to the Cohen Group and its clients. The Committee considered whether this would be appropriate given the lobbying ban that applies to senior officials for two years on leaving office.
9. The Committee recognised that potential clients using the Cohen Group's services are unknown. Given its presence in the defence sector, it is possible

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 Andrew Cumpsty; Isabel Doverty; Sarah de Gay; The Rt Hon Baroness Jones of Whitchurch; The Rt Hon Lord Eric Pickles; and Mike Weir.

that he may be asked to advise clients affected by matters he had direct involvement or oversight of.

The Committee's advice

10. The Committee considered General Sir Tim's role within NATO/the MOD and his access to information presents real and perceived risks. Though the Committee recognised the opportunity to offer an unfair advantage is limited given the views from NATO and the MOD, it is hard to argue he would not have developed privileged insight into defence matters. The Committee has therefore imposed a ban on him advising on the defence sector in this role.
11. There is a significant risk General Sir Tim could offer the Cohen Group and its clients unfair access which it would not have without employing a former MOD/NATO officer. The conditions below make it clear General Sir Tim must not make use of his access to privileged information, contacts or influence gained from his time in Crown service to the unfair advantage of the Cohen Group and its clients. It is significant that General Sir Tim has been clear that the role will include no engagement with government, or NATO. The Committee wishes to remind General Sir Tim that he must ensure that when providing internal advice he must be careful to avoid indirect lobbying, or using his privileged insight on individuals within the UK government and NATO, that the Cohen Group and its clients could engage with. That does not prevent him from making use of general skills, experience and knowledge gained in office in how the government and the military operates.
12. Under the government's Business Appointment Rules, General Sir Tim is subject to a three month waiting period from his last day in paid Crown service. The Committee determined that a waiting period would be appropriate, but determined the three month wait was sufficient given he has been on leave from his post with no access to information since July 2023 - a total of nine months providing a suitable gap between his having access to information and taking up this role.
13. The Committee advises, under the government's Business Appointment Rules, that General Sir Tim's role with **The Cohen Group** should be subject to the following conditions:
 - a waiting period of three months from his last day in Crown service;
 - 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, MOD or NATO or their arm's length bodies on behalf of the Cohen Group (including parent companies, subsidiaries, partners and clients); nor 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 Cohen Group (including parent companies, subsidiaries, partners and clients);
- 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 other governments and organisations for the purpose of securing business for the Cohen Group (including parent companies, subsidiaries and partners and clients);
- for two years from his last day in Crown service, he should not provide advice to the Cohen Group (including parent companies, subsidiaries or partners) 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, the MOD and its trading funds, NATO or their arm's length bodies; and
- for two years from his last day in Crown service, he should not advise the Cohen Group (including parent companies, subsidiaries or partners) or its clients on the defence sector, whether in the UK or elsewhere.

14. 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 from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests³. 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.

15. 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.

³ All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

16. 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*'.
17. You must inform us as soon as General Sir Tim takes up employment with this organisation, or if it is announced that he will do so, by emailing the office at the above address. Please also inform us if he 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.
18. 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. General Sir Tim wishes to take up a paid part-time role as senior counselor with the Cohen Group.
2. General Sir Tim said that he would be primarily responsible for providing insight and counsel on engagement with government officials in Europe, the UK, and internationally; counsel on building relationships and internal mentoring for the Cohen Group staff.
3. According to the Cohen Group's website, it is a US-based global consulting firm. General Sir Tim said that it provides corporate leadership with strategic advice and practical assistance in business development, market entry regulatory affairs, and deal sourcing, from strategy conception to successful closing.
4. General Sir Tim said that his role will involve no contact with the UK government or NATO.

Dealings in office

5. General Sir Tim said that he was not responsible for any policy, regulatory or funding decision specific to the Cohen Group. General Sir Tim said that his role in NATO was operationally.
6. General Sir Tim said that he did meet with members of the Cohen Group once in June 2023. He was asked on behalf of the Supreme Headquarters Allied Powers Europe (SHAPE) to outline NATO's transformation.

Department Assessment

7. The MOD and NATO have confirmed the details provided in General Sir Tim's application. The following was also confirmed:
 - the details of General Sir Tim's meeting with the Cohen Group on behalf of SHAPE and NATO to explain major changes in NATO.
 - that he was not responsible for any policy, regulatory or funding decisions specific to the company. There is no departmental contractual relationship with the Cohen Group.
 - General Sir Tim would have met with policy directors and national representatives, but his job was entirely operationally focused. General Sir Tim would have had no involvement in commercial dealings with companies providing such capabilities. He had no responsibility for commercial decisions

or contracts which sat elsewhere in NATO.

- General Sir Tim's role did not give him privileged insight into future policy, strategy of NATO or the MOD. The Committee also noted that though he had a pivotal role in developing NATO's strategy this has been agreed by NATO's leaders and has been published⁴.
- The departments recommended the standard conditions including a ban on using contacts developed within NATO.

⁴ https://www.nato.int/nato_static_fl2014/assets/pdf/2022/6/pdf/290622-strategic-concept.pdf