



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: General Sir Tim Radford KCB (CB) DSO OBE (MBE), former Deputy Supreme Allied Commander Europe for NATO. Paid Appointment with Aleck.

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 Aleck.
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 Aleck. 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 risk presented

5. There is no known relationship between government, the MOD or NATO and Aleck, nor did General Sir Tim meet with the company whilst he was in government service. He did not make any policy or regulatory decisions

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.

specifically affecting the company. Therefore, the Committee² considered the risk that he could be seen to have been offered this role as a reward for decisions made or actions taken in office is low.

6. General Sir Tim would have had access to sensitive information on defence and security which could benefit a range of organisations. The Committee noted this risk is broad and generic in nature as the proposed role does not overlap with his responsibilities in office. The MOD, nor NATO is aware of any specific information that would provide an unfair advantage to Aleck and confirmed General Sir Tim has not had access to information or any MOD/NATO work since he left post in July 2023.
7. There is 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. Such a network may offer unfair access to Aleck. General Sir Tim said he will have no involvement with the UK government, the MOD or NATO in this role.

The Committee's advice

8. The Committee determined the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear General Sir Tim cannot make use of his access to privileged information or influence gained from his time in Crown service to the unfair advantage of Aleck and its clients. In particular, alongside the usual conditions, the Committee imposed a restriction on lobbying contacts he made in other governments and organisations outside of the MOD and UK government.
9. Given the company does operate in tech and comms and there may be some general overlap with the defence sector the Committee considered it would not be appropriate for General Sir Tim to advise on the defence market and has imposed a specific condition which limits the work he can undertake with Aleck, to prevent him working in the defence market. The Committee noted this is entirely in keeping with his proposed role.
10. Under the government's Business Appointment Rules, General Sir Tim is also subject to a three month waiting period from his last day in paid Crown service.
11. The Committee advises, under the government's Business Appointment Rules, that General Sir Tim's role with **Aleck** 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;

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.

- 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 Aleck (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 Aleck (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 and in other governments and organisations for the purpose of securing business for Aleck (including parent companies, subsidiaries and partners);
 - for two years from his last day in Crown service, he should not provide advice to Aleck (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 Aleck (including parent companies, subsidiaries or partners) or its clients on the defence sector, whether in the UK or elsewhere.
12. 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.
13. 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.
14. 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*'.

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.

15. 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.
16. 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

Isabella Wynn
Committee Secretariat

Annex - Material information

The role

1. General Sir Tim wishes to take up a paid part-time role as an Advisor with Aleck. General Sir Tim said that Aleck is an audio and communication technology company that aims to make adventure sports (primarily skiing and cycling) safer and more immersive. The website states Aleck was formed for '*...intrepid outdoor adventurers who like to stay connected*' and is an '*...audio and communications technology company with an aim to make adventure sport more social, safe and immersive*'.
2. General Sir Tim said that as an Advisor he will have primary responsibility for strategic planning, quality assurance, product development and risk assessment.

Dealings in office

3. General Sir Tim said that he did not meet with Aleck while in service and that there is no known relationship between Aleck and either the MOD or NATO. He does not consider he has any access to information of specific relevance to this application.

Department Assessment

4. The MOD and NATO confirmed the details provided in General Sir Tim's application.
5. NATO confirmed that although General Sir Tim would have met with policy directors and national representatives, his job was entirely operationally focused. He has had no commercial responsibility over the last 3 years within NATO.
6. General Sir Tim's had a pivotal role in developing NATO's strategy - which has been agreed by NATO's leaders and has been published⁴.
7. The MOD recommended the standard conditions, explicitly referencing NATO.

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