



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>

May 2024

BUSINESS APPOINTMENT APPLICATION: Tom Read, former Director General for the Government Digital Service at the Cabinet Office. Appointment with Serco Group Plc.

1. Mr Read sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Civil Servants (the Rules) on an appointment he wishes to take up with Serco Group Plc (Serco) as the Group Chief Digital Technology Officer.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during Mr Read's time in office, alongside the information and influence a former Crown servant may offer Serco. 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 risks presented

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.

5. Serco is a multinational outsourcing company. It works with governments globally, including in the UK, where it holds a number of contracts for the outsourcing and delivery of services. As Chief Technology Officer at Serco, Mr Read said his proposed role will be to develop and drive technology capability and strategy for the group, ensuring that it fits within Serco's overall business strategy; and to work with the other Officers and business units to ensure technology capabilities are effectively deployed.
6. Serco has no commercial relationship with the government digital service and the Cabinet Office confirmed he made no policy, regulatory, commercial or delivery decisions that would have impacted Serco specifically. Therefore, the risk that this role is or could be seen to be a reward for decisions made or actions taken in office is low.
7. The Committee² considered there is a risk that Mr Read may be seen to have access to sensitive information pertaining to the delivery of government's digital capabilities, the relevant landscape and the commercial operation that supports the delivery of digital, that could be seen to offer an unfair advantage to Serco. The Cabinet Office said this risk is significantly limited given his delivery role, with the strategy, capability requirements and commercial decisions owned and made elsewhere, for example in the Digital and Data Office. The department considered that Mr Read did not have any access to any policy, regulatory, commercial or delivery information that is sensitive to government or that would grant Serco an unfair advantage.
8. The Committee considered there is a risk related to his influence to unfairly benefit Serco. Specifically, he may offer the company unfair access to government. It was noted that Mr Read told the Committee that his role will not involve any contact with or lobbying of government
9. It is significant that Mr Read is a digital expert, with long-standing experience in digital operations and leadership in both the public and private sectors. This role will be return to the private sector in the same area of expertise

The Committee's advice

10. The Committee determined that the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear that Mr Read cannot make use of his access to privileged information, contacts or influence gained from his time in Crown service to the unfair advantage of

² This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; Sarah de Gay; The Rt Hon Baroness Jones of Whitchurch; Dawid Konotey-Ahulu CBE; The Rt Hon Lord Eric Pickles; Michael Prescott; and Mike Weir.

Serco. For example, he must not advise Serco in bidding for future government contracts.

11. Mr Read was still in post at the time of providing this advice. The Committee wishes to make clear its recommendation is made on the basis of the information provided at that time. If Mr Read or the Cabinet Office become aware of any circumstances that would be relevant to his application and this advice, in the gap between receiving this advice and taking up this role, he must revert to the Committee for further advice. Further he and the Cabinet Office must consider and appropriately manage any potential conflicts that may arise in the meantime.

12. The Committee's advice, under the government's Business Appointment Rules, that this appointment with Serco Group Plc 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 Serco Group Plc (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 Serco Group Plc (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service, he should not provide advice to Serco Group Plc (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 or any of its arm's length bodies.

13. The advice and the conditions under the government's Business Appointment Rules relate to your 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' Interests.³ It is an applicant's personal responsibility to

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.

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.' This Rule is separate and not a replacement for the Rules in the House.
16. Mr Read must inform us as soon as he takes up this role, or if it is announced that he will do so. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments that have not been taken up or announced. This could lead to a false assumption being made about whether he had complied with the Rules and the Civil Service Code.
17. Mr Read must 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,

Shaneez Mithani
Committee Secretariat

Annex - Material Information

The Role

1. Mr Read proposes to join Serco - a multinational outsourcing company operating across the defence, health, space, justice, migration, customer services, and transport sectors. It holds contracts with the UK government. For example, it continues to operate the TFL bike-share scheme which was designed, built and operated by them from its first generation; has operated numerous train companies; had a contract in the UK for COVID-19 test and trace; and in May 2023 was awarded a £32m contract to maintain and operate the UK's air defence radars for the next 5 years.
2. In his role as the group's Chief Technology Office, Mr Read said that he would be responsible for the strategy, delivery and operation of all Serco's internal IT and data services. He said that his responsibilities would be as follows:
 - Developing and driving technology strategy for the group - ensuring this fits within the context of Serco's overall business strategy.
 - Partnering with the Chief Executive Officer, executive committee and the business units' executive committee to ensure technology investment enables and drives business strategy.
 - Working closely with business units to leverage digital and technology solutions for client benefit, and ensure these capabilities are captured and redeployed effectively across the global business footprint.
 - Foster a culture of ambition, innovation and inclusion. Providing strong leadership to attract and develop talent.
 - Building world-class digital capability across the company, ensuring teams are equipped to meet the challenges and opportunities associated with Serco's growth strategy.
 - Building broader awareness of leading-edge technology trends, capabilities and constraints that will complement and enhance the business. Acting as a pace-setter to develop Serco's tech agility and foster innovation.
 - Optimising the infrastructure portfolio to ensure availability, reliability, resilience and security at competitive cost.
 - Creating an enterprise architecture framework including security and cloud standards.
 - Understanding current data capabilities across Serco and developing with key stakeholders, owning the global data and analytics vision and strategy for the group.
 - Leading and optimising the sourcing strategy, maintaining relationships with key partners.

3. Mr Read told the Committee that this role would be internally-focused and would not include contact with government, lobbying, business development or bidding for work.
4. Mr Read also told the Committee that he secured this role after being approached by a headhunter - he did not apply for an advertised post.

Dealings in Office

5. Mr Read stated the following:
 - He did not have any dealings with Serco while in office.
 - He was not aware of any departmental relationship between Serco and the Cabinet Office.
 - He did not make any policy, regulatory, commercial or delivery decisions specific to Serco.
 - He did not have any access to policy, regulatory or commercial information that was sensitive and would give Serco an unfair advantage.

Departmental Assessment

6. The Cabinet Office confirmed that Mr Read had no contact with Serco and did not make any decisions specific to Serco in office.
7. It told the Committee that Serco holds a contract with the Cabinet Office – in the Economic and Domestic Affairs Secretariat (which coordinates and agrees the various domestic policies across all government departments), in relation to the Emergency Planning College⁴, worth just over £2 million. The college is a company wholly owned by the Cabinet Office and run by Serco - <https://www.epcresilience.com>. This is a wholly different and unrelated team to GDS.
8. The Cabinet Office stated that GDS, under Mr Read, have contracts with external firms who provide delivery support for projects. For example, Deloitte, which supported in the delivery of Gov.uk's OneLogin programme;⁵ and Thoughtworks which supports the delivery of various digital services.⁶ The Cabinet Office stated that these companies are not market competitors of Serco, as they do not operate in the same sectors or provision of services.

⁴ The Emergency Planning College provides courses on all aspects of civil protection and its library has extensive publications and resources

⁵ <https://www.publictechnology.net/2023/08/17/economics-and-finance/gds-signs-16m-deal-to-support-one-login-delivery/>

⁶ <https://www.thoughtworks.com/en-gb/clients/government-digital-service>

9. It stated that Mr Read had no access to commercially sensitive information about Serco or its competitors (such as Mite, Capita, G4S), or any policy, regulatory or delivery information that could grant Serco an unfair advantage.

10. The Cabinet Office approved this application subject to the standard conditions.