



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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September 2024

BUSINESS APPOINTMENT APPLICATION: Rebecca Lawrence, former Chief Executive Officer at the Crown Prosecution Service. Unpaid appointment with the National Preparedness Commission.

1. Ms Lawrence 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 an unpaid role with the National Preparedness Commission (the NPC) as a Commissioner.
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 Ms Lawrence's time as Chief Executive officer (CEO) of the Crown Prosecution Service (CPS), alongside the information and influence she may offer the NPC. 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 Rules set out that Crown servants must abide by the Committee's advice.¹ 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. When considering this application, the Committee² took into account this appointment as Commissioner is unpaid.³ Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of government by considering the real and perceived risks associated with former Crown servants joining outside organisations. Those risks include using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions or take action in office to in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. The CPS confirmed that there is no known overlap between Ms Lawrence's role in government and her proposed role at the NPC. There are inherent risks associated with Ms Lawrence's access to information, network and influence in government. Ms Lawrence has confirmed that she will not have contact with government in this role.

The Committee's advice

7. The Committee did not consider this appointment raises any particular propriety concerns under the government's Rules. The risks are appropriately mitigated by the standard conditions below, and further limited by the unpaid nature of this role. In particular, they prevent Ms Lawrence from drawing on privileged information, contacts and influence within government to the unfair advantage of the NPC.
8. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with the the **National Preparedness Commission** be subject to the following conditions:
 - she should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time in Crown service;
 - for two years from her last day in Crown service, she should not become personally involved in lobbying the UK government or its arm's length bodies

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

³By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

on behalf of the National Preparedness Commission (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage the National Preparedness Commission (including parent companies, subsidiaries, partners and clients);

- for two years from her last day in Crown service she should not undertake any work with the National Preparedness Commission (including parent companies, subsidiaries, partners and clients) that involves providing advice 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 its arm's length bodies.
9. The advice and the conditions under the government's Business Appointment Rules relate to her 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.⁴ 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.
10. 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.
11. 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.*"
12. Ms Lawrence must inform us as soon as she takes up this role, or if it is announced that she will do so. She must also inform us if she proposes to extend or otherwise change the nature of her role as, depending on the circumstances, it may be necessary for her to make a fresh application.

⁴ 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.

13. 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.

Shaneez Mithani
Committee Secretariat

Annex - Material Information

The role

1. The NPC is an independent and non-political body; its objective is to promote policies and actions to help the UK be better prepared to avoid, mitigate, respond to and recover from major shocks. According to its website, it operates across numerous fields including disaster response, governance and risk management, government policy and legislation, organisational preparedness, societal preparedness. It is supported by a number of partners from different sectors, including private sector companies such as Deloitte, Google, and public institutions such as Cranfield University. It is chaired by Lord Toby Harris.
2. Ms Lawrence told the Committee that the role will be unpaid and part-time. She said that her responsibilities will be:
 - Acting as an ambassador of the work of the NPS.
 - Providing subject matter expertise - though own experience as well as wider network.
 - Critical analysis of organisational strategy.

She said that her role will not involve contact with government.

3. Ms Lawrence said that she was chosen for the variety, depth of insight, and experience she can bring to the role. She said she was offered this role by Lord Toby Harris, who she has previously worked with on two occasions, through the Metropolitan Police and the Mayor's Office for Policing and Crime.

Dealings in office

4. Ms Lawrence said that:
 - she did not meet with the NPC while in office;
 - she did not make any policy, commercial or operational decisions specific to the NPC;
 - she did not have access to any sensitive information specific to the NPC; and
 - there is no departmental relationship between the CPS and the NPC.

Departmental assessment

5. The CPS confirmed the information provided in Ms Lawrence's application.

6. The CPS did not have any concerns regarding this appointment and the standard conditions were recommended to mitigate any inherent risks.