



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Sir Alex Chisholm KCB, former Permanent Secretary at Cabinet Office. Unpaid appointment to the Leadership Council of the International Business and Diplomatic Exchange.

1. Sir Alex sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for former Crown Servants (the Rules) on an unpaid role with the International Business and Diplomatic Exchange (IBDE) as a member of the Leadership Council.
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 Sir Alex's time in office, alongside the information and influence a former Crown servant may offer IBDE. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee has advised that a number of conditions be imposed to mitigate the potential risks to government associated with this appointment under the Rules. The Committee's advice is not an endorsement of this application in any other respect.
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. When considering this application, the Committee² took into account this appointment as a member of the Leadership Council is unpaid³. 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 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. As with any former senior Crown servant, there are inherent risks associated with his access to information, contacts and influence within government. In this unpaid role these risks are limited. Alongside the lack of financial gain, the government is already a stakeholder of IBDE and he will be joining several current serving senior Crown servants on the Leadership Council.

The Committee's advice

7. The Committee did not consider this appointment raises any particular propriety concerns under the government's Business Appointment Rules. As above, the unpaid signature of this role significantly limits the risks subject to standard conditions. These seek to prevent Sir Alex from drawing on privileged information and using his contacts to the unfair advantage of his new employer, will sufficiently mitigate the risks in this unpaid appointment.
8. In accordance with the government's Business Appointment Rules, the Committee advises Sir Alex's appointment with the **International Business and Diplomatic Exchange** be subject to the following conditions:
 - Sir Alex 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 International Business and Diplomatic Exchange (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government to influence policy, secure business/funding or otherwise unfairly advantage the International Business and Diplomatic Exchange (including parent companies, subsidiaries, partners and clients); and

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

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.

- for two years from his last day in Crown service, he should not provide advice to the International Business and Diplomatic Exchange 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.
9. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's previous role in government only; there are separate rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Commissioner for Standards⁴. 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. Sir Alex must inform us as soon as he takes up this work or if it is announced that he will do so. Similarly, he must inform us if he proposes to extend or otherwise change his role with the organisation as depending on the circumstances, it might be necessary for her to seek fresh advice.
 13. Once this 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,

Madeleine Crowther
Committee Secretariat

Annex - material information

The role

⁴ All Peers and Members of Parliament are prevented from paid lobbying under the Parliamentary Code of Conduct and the Code of Conduct for Members of the House of Lords.

1. Sir Alex wishes to take up a part-time, unpaid role as a member of the Leadership Council.
2. The IBDE is a not-for-profit membership organisation aimed at promoting international trade and investment flows, as well as championing commercial and economic diplomacy.
3. The Leadership Council is IBDE's most senior and influential member forum, which includes several currently serving Permanent Secretaries, in addition to senior business leaders and academic experts.
4. As a member of the Leadership Council, Sir Alex stated his responsibilities will be to: *'advise and support the IBDE Board and the Executive on policies, strategies and activities, ensuring that they achieve the organisation's mission and objectives. The Leadership Council reviews, discusses, offers insights into and for the IBDE working programme.'*

Dealings in office

5. Sir Alex said his only official dealings with IBDE were several years ago when he had one stakeholder meeting during his time at the Department for Business, Energy and Industrial Strategy. He did not make decisions specific to the organisation nor does he have access to particular privileged information.

Departmental assessment

6. The Cabinet Office confirmed the details Sir Alex provided. It noted the low risk attached and that current senior members of government are already members of the Leadership Council. It recommended standard conditions.