



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Leo Docherty, former Minister of State for the Armed Forces at the Ministry of Defence. Prior to that, Parliamentary Under Secretary of State for Europe, at the Commonwealth and Development Office. Paid appointment with Palantir Technologies UK Ltd.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) for a role you wish to take up with Palantir Technologies UK Ltd (Palantir) as an Advisor.
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 your time in office, alongside the information and influence a former defence and foreign affairs minister may offer Palantir. 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 the potential overlap with your roles at the Ministry of Defence (MOD) and the Foreign, Commonwealth and Development Office (FCDO) and Palantir's work in defence and security technology. The Committee also considered the information provided by the departments about your access to information and decision making in office.
4. 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.
5. The Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament,

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

6. Palantir is an American technology company that specialises in big data analytics. Palantir has a commercial relationship with the UK government providing various software and data tools. Palantir operates in numerous sectors, including defence, with several contracts with the UK MOD. You wish to advise Palantir on geopolitical risk, international emerging artificial intelligence trends and global economic and market trends.
7. You had overall responsibility for the operations and operational policy of the armed forces, including the provision of digital services for the armed forces. The most significant contract between the UK MOD and Palantir is an Enterprise Agreement for the provision of the Palantir software tool-set at all security classifications, for the next three years. This contract was signed prior to your time in office at the MOD. There is no evidence that you made any decisions specific to the company whilst in office, either in your most recent role at the MOD, or prior to that at the FCDO. Therefore, the Committee¹ considered the risk that you could reasonably be seen to have been offered this role as a reward for decisions made or actions taken whilst in service is low.
8. Whilst Palantir is not a defence company, it operates in the defence sector. As Minister for the Armed Forces, you had access to sensitive information around the UK's defence operational policies and overseas operations. You will also have had access to a wide range of information relating to geopolitical matters including national security from your time as Parliamentary Under Secretary of State at the FCDO.
9. There are mitigating factors that help reduce the risks associated with your access to information and insight:
 - you were in post at the MOD for just over three months, and it has now been over five months since you last had access to information., creating a gap between your employment and access to information.
 - you left the FCDO over eight months ago and the foreign affairs space is fast moving and reactionary to global incidents, and therefore many matters on which you had access to information have moved on.
 - neither the MOD, nor the FCDO was aware of any information you had been privy to in office that would offer Palantir an unfair advantage.

¹ 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 Eric Pickles; Michael Prescott; and Mike Weir. The Baroness Thornton was unavailable.

10. Despite the mitigations, there remains a risk you may have access to information that may offer privileged insight from your time in office. This risk is broad rather than specific to this role, or company and relates to general access to information given your responsibilities for national security matters, as PUS at the FCDO and overseas operations of the armed forces.
11. You would also have amassed a wide range of contacts during your time in office within the MOD and FCDO. As a result, there is a risk you could be seen to offer unfair access to the UK government. Further, it would be difficult to manage the perception you were seeking to influence the UK government on Palantir's behalf if you were to seek direct engagement with the UK government on the company's behalf. Palantir confirmed your role will be separated from its lobbying activity, as noted in the annex below.

The Committee's advice

12. There is a reasonable concern this role could be seen to overlap with your recent ministerial roles at the FCDO and the MOD. Particularly given your relatively recent time at the MOD with responsibility for operational policy and the provision of digital services for the armed forces. In the circumstances, the Committee has imposed a condition on your role to prevent you from advising on the UK defence sector. Whilst this will not prevent you from advising on geopolitical issues and trends in artificial intelligence and the economy/markets, you must avoid the defence sector and any matters you were involved in at the FCDO that are privileged or have not yet been made public.
13. Palantir has a significant commercial interest in the UK government. Because of this, the Committee's advice is that you must have no direct engagement with government on behalf of the company, as to do so would raise significant risks under the government's Rules.
14. It is significant that Palantir confirmed its adherence with the Committee's advice and, in particular, that you would not be involved in any lobbying of the UK government.
15. The remaining conditions below seek to prevent you from making improper use of privileged information, contacts and influence to the unfair advantage of Palantir.
16. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Palantir Technologies UK, Ltd** be subject to the following conditions:

- you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in ministerial office;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of Palantir Technologies UK, Ltd (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial office to influence policy, secure business/funding or otherwise unfairly advantage Palantir Technologies UK, Ltd (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to or on behalf of Palantir Technologies UK, Ltd (including parent companies, subsidiaries, partners and clients) 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 any of its arm's length bodies;
- for two years from your last day in ministerial office, you must not advise Palantir Technologies UK, Ltd (including parent companies, subsidiaries, partners and clients) on the UK defence sector, including in relation to foreign affairs where matters from your time in office remain in flux; and
- for two years from your last day in ministerial office, you should not have any engagement on behalf of Palantir Technologies UK, Ltd (including parent companies, subsidiaries, partners and clients) with the UK government.

17. 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.

18. 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.*"

19. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so. You must also inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.
20. 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.

The Rt Hon Lord Pickles

Annex - material information

The role

1. Palantir Technologies Limited (Palantir) is an American company that specialises in big data analytics. It has four main platforms: AIP, Foundry, Gotham and Apollo.
2. Some of these platforms are used by American counterterrorism organisations and the US' defence department - with its early customers being the US intelligence community. The company has had a relationship with the MOD for a number of years, with the use of Palantir software mature within many of its delivery organisations. Most recently the MOD agreed a contract with Palantir at the end of 2022.
3. Prior to this contract, Palantir provided its platform Palantir Foundry to the NHS during the Covid-19 pandemic. This was done initially as a low-cost emergency pilot, but in 2020 this was valued at more than £23.5 million and was extended for two more years.
4. You seek to join Palantir as an Advisor on: geopolitical risk; international emerging artificial intelligence trends; and global economic and market trends. You will not have contact with the government in this role.

Correspondence with Palantir on compliance

5. Palantir confirmed in writing its agreement to comply with the Committee's advice, stating that:
 - *'Palantir is confident that Mr Leo Docherty's anticipated role as a consultant and the comprehensive Palantir Compliance Program in*

place will enable him to comply with all conditions imposed by ACOBA and all applicable Business Appointment Rules.

- *Palantir will ensure that it does not ask Mr Docherty to undertake any activity that might be a breach of any of his restrictions or conditions.*
- *Palantir will ensure that Mr. Doherty knows these conditions will apply for two years from his last day in paid Crown service.'*

6. Palantir confirmed the Committee's advice will be complied with via the company's internal compliance processes:

- 'As part of his new employee onboarding, Palantir will provide Mr. Doherty with an individual compliance training session where a lawyer on Palantir's Compliance Team will specifically go over his restrictions and conditions, including that he will be restricted from providing advice to Palantir on UK's defence, national security and foreign affairs matters (which includes lobbying or other engagement with the UK government on Palantir's behalf).*
- During this individual compliance training session, Mr. Doherty will also be provided with specific information about the Palantir work or activities that he will be recused from based on the ACOBA restrictions and conditions.*
- Immediately after the training, Palantir's Compliance Team will also provide him a written summary of his restrictions and conditions.*
- Palantir employees who will most regularly work with Mr. Doherty, including his immediate supervisor, will be informed of his restrictions and conditions.*
- Lawyers on Palantir's Compliance Team will also be aware of Mr. Doherty's restrictions and conditions and will be available to assist Mr. Doherty with these requirements as needed.'*

Dealings in office

7. You said you have known the CEO of Palantir since before your time as an MP and then a minister.
8. You said you are aware of the enterprise agreement for the Palantir software tool-set at all security classifications, signed in 2022 before you joined the MOD as a minister. You informed the Committee that as a minister, you had no involvement in any decisions specific to Palantir; no involvement in commercial contracts; you did not meet them in office; and do not consider you have any access to privileged information that would be beneficial to the company

Departmental assessment

9. The FCDO and the MOD provided views on this application, given your two previous roles. They confirmed the details in your application

10. The following additional information was provided:

- i. The MOD said Palantir holds contracts with Defence Digital- the largest of which is an Enterprise agreement of value £80M signed in 2022.
- ii. The FCDO said that as a US data analytics firm (with ties to defence and national security sectors), it has only recently had direct engagement with the organisation's Vice President through a US elections roundtable in October 2024. The FCDO confirmed that any contact would fall to the Technology & Analysis Directorate and Internal Tech Department, who have engaged with Palantir in the past.
- iii. Access to information - Whilst you had responsibility for operational digital systems during your time as Minister for the Armed Forces, The MOD confirmed that during your relatively short period in post, you did not make any regulatory or policy decisions that affected Palantir specifically. The FCDO noted your responsibility for the Export Controls Joint Unit (which administers the UK's system of export controls and licensing for military and dual-use items) during his time as Ministers of State, which he left over two years ago for completeness. The department was not aware of any specific decisions involving Palantir.
- iv. Defence Digital at the MOD is responsible for the Enterprise Agreement and the other contracts held with Palantir. The MOD said any contracts signed with Palantir were under the threshold of those requiring ministerial approval, and that the original contract for the enterprise agreement was signed prior to his joining office.
- v. Neither department is aware of any specific access to information you had that would now offer Palantir an unfair advantage.

11. The departments raised no concerns and made no recommendations beyond the standard conditions be applied.