

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Mark Harper, former Secretary of State at the Department for Transport. Paid appointment with Reconnaissance Ventures Limited.

1. You approached the Advisory Committee on Business Appointments the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as a Non-executive Director (NED) with Reconnaissance Ventures Limited.
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 you may offer Reconnaissance Ventures Limited. 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 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

5. Reconnaissance Ventures Limited is the holding company for RVL Aviation – a multi-capability aviation services provider. It has contracted with HM

Maritime and Coastguard Agency, an executive agency of your former department, and the Department for Transport (DfT) in the development of an Agile Convert Spray System (ACSS)¹ – an aerial spray system to help with oil spills.

6. As Secretary of State for Transport, you met with representative bodies of the aviation sector alongside officials; and you were involved in the Sustainable Aviation Fuel Mandate². DfT confirmed that you did not meet with, nor were involved in any policy, regulatory and/or commercial decisions that were specific to RVL Aviation, including the development of the ACSS as noted above. Therefore, the Committee³ considered the risk this role could reasonably be perceived as a reward for decisions made, or actions taken, in office to be limited.
7. As Secretary of State for Transport, you would have had access to information that could be perceived to benefit Reconnaissance Ventures Limited, or any others working in the same industry. DfT confirmed that the majority of information of relevance and initial view is now in the public domain or has since progressed under the current government⁴. Further, it has been over eight months since you left the department and the change of government, both reducing the currency of any privileged insight into matters you may still possess.
8. As with any former minister, there are risks associated with your contacts and influence within government and the potential for Reconnaissance Ventures Limited to gain unfair access or influence as a result. You confirmed your role as Non-executive Director excludes any dealings with government, reducing the risk you could be perceived to be lobbying government – which all former ministers are prevented from doing for two years after leaving office.
9. It is also relevant that, as an aviation company, RVL Aviation is regulated by the Civil Aviation Authority (CAA) which sits at an arm's length from DfT.

¹ www.rvl-group.com/aerial-spray/

² www.gov.uk/government/collections/sustainable-aviation-fuel-saf-mandate – The Sustainable Aviation Fuel Mandate is the UK's key policy to decarbonise aviation fuel by encouraging the supply of sustainable aviation fuels.

³ This application for advice was considered by Andrew Cumpsty; Hedley Finn OBE; Sarah de Gay; Dawid Konotey-Ahulu CB DL; The Rt Hon Lord Eric Pickles; The Baroness Thornton; Michael Prescott; and Mike Weir. Isabel Doverty was unavailable.

⁴ hansard.parliament.uk/commons/2025-01-09/debates/595E6BE4-A7B9-45ED-BAFA-FA4D4D261115/SustainableAviationFuels

The Committee's advice

10. While there is a sectoral overlap between your responsibilities in office, the proposed employers work and Committee considered the risks associated with your access to information are limited for the reasons set out above. The risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information, contacts or influence gained from your time in ministerial service to the unfair advantage of Reconnaissance Ventures Limited.

11. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Reconnaissance Ventures Limited** 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 its arm's length bodies on behalf of Reconnaissance Ventures Limited (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 Reconnaissance Ventures Limited (including parent companies, subsidiaries, partners and clients); and
- for two years from your last day in ministerial office you should not undertake any work with Reconnaissance Ventures Limited (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.

12. 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' Interests⁵. It is an applicant's personal responsibility to

⁵ 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.

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 Ministerial Code or otherwise.
14. The Business Appointment Rules explain that the restriction on lobbying means that you '*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*'.
15. 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.
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.

The Rt Hon Lord Pickles

Annex – Material Information

The role

1. According to its website, RVL Aviation is a multi-capability airline operating in – air freight, passenger charter, aerial survey and specialist operations – with aircraft management and maintenance resources at its East Midlands Airport HQ.
2. Reconnaissance Ventures Limited is the holding company of RVL Aviation – a company which has previously contracted with HM Maritime Coastguard

Agency in the development of an Agile Convert Spray System (ACSS)⁶ – an aerial spray system to help with oil spills.

3. You stated RVL Aviation is a specialist aviation services provider, offering 24/7 services to a range of private and public sector clients. You said it has expertise in areas as diverse as aerial surveillance and airborne survey, ad hoc and long-term aircraft charter, temporary and permanent aircraft modifications for project work and aerial dispersant services to combat oil pollution in the marine environment.
4. In your paid, part-time role as a NED, you stated your role is to provide independent oversight and strategic guidance to the Board, ensuring robust governance, financial sustainability, and long-term success. The NED role will contribute to high-level decision-making, company growth, risk management, and corporate strategy while constructively challenging and supporting the executive team. You stated your responsibilities as being to:
 - Support and challenge the executive team in decision-making, risk assessment, and corporate governance.
 - Serve as an advisor to the Board and Executive Team, bringing external expertise and insight.
 - Participate in key strategy discussion and ensure alignment with the company's vision and objectives.
 - Ensure compliance with regulatory and legal obligations, promoting best practices in corporate governance.
 - Offer independent judgment and constructive scrutiny of financial performance, risk management, and operational efficiency.
 - Provide mentorship and guidance to senior management where appropriate.
5. You stated that you have informed RVL Aviation that you will not be involved in lobbying government (ministers or officials) or preparing bids for contracts/awards from government and that the company has agreed to this.

Dealings in office

6. You stated you were not involved in any policy, regulatory or commercial decisions specific to RVL Aviation. You stated you had overall responsibility for the aviation industry and the main area of policy/regulation which you dealt

⁶ <https://www.rvl-group.com/aerial-spray/>

with affecting the aviation sector as a whole was on legislation for the Sustainable Aviation Fuel (SAF) mandate⁷.

7. You stated that you did not meet with or have dealings with RVL Aviation whilst in office, though you dealt with representatives of the aviation industry on a number of occasions.
8. You stated RVL Aviation has a relationship with your former department – as the company has a contractual relationship with HM Maritime & Coastguard Agency. You stated you had no involvement in any aspect of this commercial arrangement during his time in office.
9. You stated you do not have access to sensitive information specific to RVL Aviation that may provide an unfair advantage to the company.

Departmental assessment

10. DfT provided its views on your proposed appointment:

- you had contact with representatives of the aviation industries and may have had contact with competitor companies although if this did occur this is highly likely to have been in forums alongside other stakeholders (e.g. a roundtable) and not one on one.
- DfT does not currently have a relationship with RVL Aviation. It also added that RVL Aviation has a contractual relationship with HM Maritime and Coastguard Authority, although you would not have had contact, involvement and/or sight of these arrangements.
- you did not meet with, nor were involved in decisions specific to RVL Aviation.
- you would have had access to information on policy development and access to commercially sensitive information on companies in the aviation sector. The department considers the time since you left office (over eight months), change of government policy direction renders the majority of the information you were privy to, are in the public domain and/or are now outdated.

11. DfT did not have concerns with the proposed appointment and recommended the standard conditions.

⁷ <https://www.gov.uk/government/collections/sustainable-aviation-fuel-saf-mandate> – The SAF Mandate is the UK's key policy to decarbonise aviation fuel by encouraging the supply of sustainable aviation fuels.