



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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**BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: Sir Gareth Rhys Williams Bt CB, former Government Chief Commercial Officer at the Cabinet Office. Paid appointment with PurpleSector Limited.**

1. Sir Gareth sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for former Crown Servants (the Rules) seeking advice on taking up a paid role as a Non-Executive Director (NED) at PurpleSector Limited (PurpleSector).
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 taken during Sir Gareth's time in government, alongside the information and influence he may offer PurpleSector. 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<sup>1</sup> 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 risk presented

<sup>1</sup> 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. PurpleSector is an engineering consultancy. It uses Formula 1™ (F1) methodology and practises to provide ‘...*data-driven solutions, and complex process optimisation to multiple industrial segments.*’ Sir Gareth told the Committee<sup>2</sup> that PurpleSector carries out modelling of complex industrial processes to support faster delivery of products to the market and optimise efficiency of processes. Purple Sector advises across a range of sectors including automotive, manufacturing, marine, aerospace, defence, pharmaceuticals, medical, consumer goods, motorsport, and climate tech. As a NED, Sir Gareth will be advising PurpleSector on the issues facing a fast-growing organisation.
6. Sir Gareth met with the CEO of PurpleSector, Mark Mathieson, in relation to government investigations into the efficient turnaround of covid testing. Sir Gareth was not involved in, nor had sight of Mr Mathieson’s contract here, which was a subcontract with PA Consulting. This was unrelated to Purple Sector. Sir Gareth did not make any commercial or policy decisions relevant to PurpleSector while in office, nor is there any departmental relationship with PurpleSector. The Committee determined that the risk that this work could reasonably be seen as a reward for decisions or actions taken in office was low.
7. As Government Chief Commercial Officer (GCCO), Sir Gareth was the de facto head of the Civil Service Commercial function. It is likely that he had access to a range of sensitive information that could, or be seen to, benefit any organisation. In particular, commercial capabilities, requirements, opportunities, and pressure points within government. The Committee agreed with the Cabinet Office that there are several factors that mitigate the risk associated with his access to information:
  - The Cabinet Office was not aware of any sensitive information to which Sir Gareth had access that could offer PurpleSector an unfair advantage over its competitors.
  - The Cabinet Office took steps to limit his access to information from February 2024 – removing him for commercially sensitive aspects of the role. Two interim positions took on his sensitive commercial responsibilities and teams were notified of the new arrangements.
  - He left his post three months ago, and has not had access to sensitive information for eight months.
  - When competitions for commercial contracts which were overseen by his teams and himself were out to tender, these were advertised publicly.
  - He is prevented from drawing on privileged information and have an ongoing duty of confidentiality – this is particularly relevant given that

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

he holds ongoing roles with government as a NED at the Crown Commercial Service,<sup>3</sup> which is shortly to come to an end; and he was recently appointed Chair of National Highways, sponsored by the Department for Transport (DfT).<sup>4</sup>

8. There nevertheless remains a risk that Sir Gareth retains commercial insight from his time in government. Particularly as PurpleSector advises a range of clients. This risk may arise, for example, should he be asked to advise on matters that overlap with his time in office, or should PurpleSector or its clients seek to work for government.
9. There are risks associated with Sir Gareth's network of contacts and potential influence within government. It is significant that PurpleSector does not appear to have any particular interest in working with government clients, his role will not involve lobbying or contact with government, and he held a career in transforming and growing engineering firms before joining government.
10. Sir Gareth's role will include advising on the problems that arise as a company grows rapidly. As GCCO he had contact with commercial organisations on behalf of government. Whilst the Committee noted that he has extensive experience in this sphere that predates his time as GCCO including, no doubt, a range of contacts, there is a risk he could offer an unfair advantage to PurpleSector by drawing on any contacts gained only as a result of his time in office.

#### The Committee's advice

11. The Committee determined that the risks identified can be appropriately mitigated by the conditions below. These make it clear that Sir Gareth cannot make use of privileged information, contacts or influence gained from his time in Crown service to the unfair advantage of PurpleSector and/or its clients.
12. In addition, a further restriction limiting his role with PurpleSector has been imposed: to mitigate the limited risk of overlap with his responsibilities in office – associated with unknown clients.
13. Given his continuing roles in government, the Committee advised that any potential conflicts must be handled by the departments in the usual way and in accordance with the Code of Conduct for Board Members of Public Bodies. The conditions below have also been amended to remind him that he must not

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<sup>3</sup> <https://quarterly.blog.gov.uk/author/gareth-rhys-williams/>

<sup>4</sup>

<https://www.gov.uk/government/news/transport-secretary-announces-sir-gareth-rhys-williams-as-new-national-highways-chair>

make use of privileged insight gained from these roles within a government department.

14. In the circumstances, the Committee's advice in accordance with the government's Business Appointment Rules is that this work with **PurpleSector Limited** 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 or in any capacity in which he continues to represent the UK government;
- for two years from his last day in Crown service, he should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of PurpleSector Limited (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage PurpleSector Limited (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service he should not undertake any work with PurpleSector 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;
- for two years from his last day in Crown service, he should not become personally involved in lobbying contacts he developed during his time in office in other governments and organisations for the purpose of securing business for PurpleSector Limited; and
- for two years from his last day in Crown service, he should not advise PurpleSector Limited or its clients on any work with regard to any policy, commercial or operational work which he had a material role in developing or determining as Government Chief Commercial Officer, or where he had a relationship with the company or organisation during his time in this role.

15. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's 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.<sup>5</sup> 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.

16. 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.
17. 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*'.
18. Sir Gareth must inform us as soon as his appointment is live or is announced. He must also inform us if he proposes to extend or otherwise change the nature of this work as, depending on the circumstances, it may be necessary for him to make a fresh application.
19. Once this work has been publicly announced or set 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**

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<sup>5</sup> 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 the various obligations under the Codes 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.

## Annex - Material information

### The role

1. PurpleSector is an engineering consultancy. Its website states that it provides *'data-driven solutions, and complex process optimisation to multiple industrial segments...fuelled by Formula 1™ derived methodology and culture'* Sir Gareth told the Committee that it carries out modelling of complex industrial processes to support faster delivery of products to the market and optimise efficiency of processes. It operates in a range of sectors and industries including automotive, manufacturing, marine, aerospace, defence, pharmaceuticals, medical, consumer goods, motorsport, and climate tech. It has no contractual relationship with government.
2. Sir Gareth proposes to work as a paid, part-time, Non-Executive Director (NED). He said that his responsibilities will be advising the executive board as follows:
  - how to grow the company
  - things to watch out for as they grow
  - pitfalls to avoid when growing.

He said that this role will not involve contact with government.

3. Sir Gareth said that he has extensive experience in running and rapidly growing innovative engineering companies, before he joined the Civil Service in 2016. He said that he has worked at engineering firms such as Charter International, Lucas, and BPB.

### Dealings in office

4. Sir Gareth said that he did not make any decisions specifically affecting PurpleSector, and did not have any access to sensitive information that would grant PurpleSector an unfair advantage.
5. He said that although his last day in Crown service was in July 2024, his role was restricted in February 2024, to reduce his access to commercially sensitive information.
6. Sir Gareth told the Committee that he met with the CEO, Mark Mathieson, in March 2020, while he was GCCO. He provided the following information:
  - They met when he (Sir Gareth) was running the Ventilator Challenge<sup>6</sup> – for rapid scale up of ventilators during the covid-19 pandemic.

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<sup>6</sup> <https://www.gov.uk/government/news/ventilator-challenge-hailed-a-success-as-uk-production-finishes>

- He and Mr Mathieson met 4 or 5 times face-to-face.
  - Mr Mathieson was a government subcontractor through PA Consulting, to work on the Penlon ventilator supply chain<sup>7</sup> and to investigate ways of improving the speed with which Covid testing could be turned around.
  - He was not involved with Mr Mathieson's contractual arrangements.
  - No policy decisions flowed from that work.
  - He did not meet with PurpleSector while in office.
7. Sir Gareth said that he was approached by Mr Mathieson in 2024, as Mr Mathieson was looking for a NED to advise him on how to grow the business, based on the individual's past experience. Sir Gareth said that in discussions for the role, he made it clear that working for him would only be possible after he had left office.
8. Sir Gareth has two ongoing roles with the UK government:
- As a NED/Sponsor for the Crown Commercial Service. He has been in this role since January 2017, and will step down in November 2024. The purpose of the role is to support the board and CEO.
  - As the National Highways Chair at the Department for Transport. He started his role in April 2024. The purpose of the role is to oversee the delivery of the government's £24 billion investment into roads over five years, *'which will bring improved journeys, ease congestion, create jobs and grow the economy across the country.'*

### Department Assessment

9. The Cabinet Office confirmed what Sir Gareth had said in his application. It provided the following information:
- He did not make any commercial, policy or regulatory decisions specific to PurpleSector.
  - There is no departmental relationship with PurpleSector. Additionally, PurpleSector does not receive any government grants and does not engage in regulated functions.
  - He did not have dealings with any competitors of PurpleSector for the last two years in office.
  - He did meet with Mr Mathieson in office, when the latter was a subcontractor for the turnaround of covid-19 testing. Sir Gareth did not have any knowledge of the contract's terms and conditions (e.g. pay).
10. The Cabinet Office said that Sir Gareth did not have access to any commercially sensitive information that could benefit PurpleSector. It said that his role was restricted from February 2024 to avoid any conflicts of interest. It

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<sup>7</sup> <https://www.penlon.com/news/uk-government-orders-15000-eso-2-ventilators/>

said that his role was restricted in that he has:

- not reviewed, nor been exposed to documentation naming final stage vendors;
- not attended meetings about or with vendors unless the discussions on commercial matters were limited to the application of frameworks or similar publicly available information;
- not attended meetings where vendor bids were decided upon;
- stepped down from Cabinet Office committees, including the Executive Committee, Performance and Risk Committee etc;
- removed himself from any further business planning; and
- any correspondence intended for the Government Chief Commercial Officer was re-routed to the Chief Operating Officer mailbox.

These responsibilities were reallocated to two other individuals on an interim basis.

11. The Cabinet Office said that it considered that PurpleSector would benefit from Sir Gareth's experience, skillset and contacts gained prior to joining the civil service.

12. The department recommended the standard conditions.