



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Dame Menna Rawlings DCMG CVO, Ambassador to France and to Monaco, the Foreign, Commonwealth, and Development Office. Paid appointment with Queens' College, the University of Cambridge.

1. Dame Menna sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) on an appointment she wishes to take up with Queens' College, University of Cambridge (Queens' College), as President of the College.
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 Dame Menna made during her time in office, alongside the information and influence she may offer Queens' College. 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 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.

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.

The Committee's consideration of the risks presented

5. Queens' College is a constituent college at the University of Cambridge. It is a self-governing institution within the university, whose function is to provide accommodation, education, social activities, and welfare services to students and faculty attached to it. As the President of the college, Dame Menna's role will focus on fostering the college's environment, running the college, chairing college committees, fundraising and establishing a network for the college, and joining discussions at university-level with education policy-makers.
6. The FCDO confirmed that Dame Menna did not meet, nor make any decisions relating to Queens' College while in government. The Committee² considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
7. There are inherent risks associated with Dame Menna's access to information, but the FCDO has confirmed that she has no access to specific information of relevance to this proposed role. This is further mitigated by the fact that Dame Menna plans to have a two month gap between leaving government and taking up this role with Queens' College.
8. Dame Menna told the Committee that she expects to have some contact with government in this role, through networking events, and to discuss policy changes affecting the higher education sector with the Department for Education (DfE), at a university-wide level, rather than at college-level. The Committee considered whether this would be improper, given the lobbying ban which applies to all senior officials on leaving office. The nature of the organisation is relevant here, as it is an educational and research establishment, and the University of Cambridge is a stakeholder of DfE. It would not be improper for Dame Menna to engage with the government where she is invited to do so, or where she is providing information transparently; but it would be improper for her to lobby the government for changes to policy or funding. To do so would risk granting Queens' College and by extension the University of Cambridge an unfair advantage.
9. There are additional risks related to Dame Menna's network of contacts outside of government, should she seek to use them to broaden Queens' College's network, or for fundraising purposes.

² This application for advice was considered by Andrew Cumpsty; Sarah de Gay; Isabel Doherty; David Konotey-Ahulu CBE DL; Hedley Finn OBE; Michael Prescott; The Baroness Thornton; and Mike Weir.

The Committee's advice

10. The Committee determined that the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear that Dame Menna cannot make use of her access to privileged information or influence gained from her time in Crown service to the unfair advantage of Queens' College.
11. Dame Menna was still in post at the time of providing this advice. The Committee wishes to make clear its recommendation is made on the basis of the information provided at that time. Should Dame Menna become aware of any circumstances that would be relevant to her application and this advice, in the gap between receiving this advice and taking up this role, she should revert to the Committee for further advice. Further she and the FCDO must consider and appropriately manage any potential conflicts that may arise in the meantime.
12. In the circumstances, the Committee's advice in accordance with the government's Business Appointment Rules is that this work with **Queens' College, University of Cambridge** should be made 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 government or its arm's length bodies on behalf of the Queens' College, University of Cambridge (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 Queens' College, University of Cambridge, including parent companies, subsidiaries, partners and clients);
 - for two years from her last day in Crown service, she should not provide advice to the Queens' College, University of Cambridge (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 government or its arm's length bodies; and
 - for two years from her last day in Crown service, she should not become personally involved in lobbying contacts he has developed during her time in office and in other governments and organisations for the purpose of securing

business or funding for Queens' College, University of Cambridge (including parent companies, subsidiaries and partners).

13. The advice and the conditions under the government's Business Appointment Rules relate to an individual's previous role in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. It is an individual's responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice
14. 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.
15. 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.*"
16. You must inform us as soon as you take up this role, 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.
17. 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. Queens' College at the University of Cambridge is a self-governing institution within the University. It provides education and scholarships, social functions, housing, welfare and pastoral care to its students and staff that are attached to it.
2. Dame Menna told the Committee the following information about her paid, part-time role as President of the College:
 - She would be championing the College's achievements.
 - She would be fostering the overall education, living and working environment, with a focus on inclusion and increasing access to education for people from under-represented groups.
 - She would be chairing the governing body which has overall responsibility for the running of the College, as well as chairing the main college committees, which have oversight of the management of the College and make recommendations to the Governing Body on educational and financial policy, elections to Fellowships and appointments to offices, as well as other academic, estates and staff matters.
 - She would be meeting alumni and benefactors and presenting Queens' to a range of audiences in the UK and overseas, hosting events and promoting fundraising projects.
 - This role will likely involve some contact with government, and that any contact would be because of networking events, or or engagement on questions of future policies on universities (with DfE). She said that this would not involve lobbying, and will be done at university-level, rather than college-level.
 - She said that she thinks she will remain linked-in to the world of geopolitics and diplomacy, using Queens College as a platform for dialogue and events, in line with the academic purpose of the College.
 - She secured the role through open competition.

Dealings in office

3. Dame Menna advised the Committee that during her time as Ambassador for France and Monaco, she did not meet with, nor make any decisions specific to either the College or University, nor did she have any access to information that could grant its competitors an unfair advantage.
4. She told the Committee that she had general contact with alumni groups of different UK universities while in France, and had a particularly close

relationship with the University of London in Paris, hosting some joint events and their annual graduation ceremony. She said that this is not a direct competitor of Queens College.

5. She also said that there is a close connection between diplomacy, academia and think tanks, which is partly why she had contact with different universities.

Department Assessment

6. The FCDO confirmed the details Dame Menna provided and recommended standard conditions be applied.