



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Steven Boyd MBE, former Chief Executive at the Government Property Agency. Paid appointment with Total Flow Limited.

1. Mr Boyd sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Crown Servants (the Rules) on taking up a role as a Consultant with Total Flow Limited (Total Flow).
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 Mr Boyd's time in office, alongside the information and influence he may offer Total Flow. 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 set out that Crown servants must abide by the Committee's advice¹. 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

5. Mr Boyd did not make any policy, regulatory or commercial decisions specific to Total Flow, nor did he meet with the company in office. Therefore, the

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

Committee² considered the risk this role could reasonably be perceived as a reward for decisions or actions in office is low.

6. There is no direct overlap between Mr Boyd's responsibilities in office, as Chief Executive of the Government Property Agency, and the role he wishes to take up with Total Flow. The risks related to his access to information are limited because overlap in his access to information is broad. He has been out of office for over ten months, creating a gap between his role with Total Flow and his access to information. It is also significant that Mr Boyd has worked in built environment, property and infrastructure for his whole career.
7. Total Flow's clients and the precise nature of Mr Boyd's work for the company are unknown. Therefore, there is a limited risk he may offer unfair insight – if, for example, Mr Boyd were asked to advise Total Flow or its clients on matters he was personally involved as Chief Executive of the Government Property Agency.
8. There is also a risk associated with any senior Crown servant leaving office and joining an external organisation with a potential interest in government contracts.

The Committee's advice

9. The risks in this application are limited. To address the risk associated with Total Flow's unknown clients, the Committee has imposed a condition that prevents Mr Boyd advising on the government's estate/ portfolio for which he was responsible for in office. It is important that Total Flow has confirmed that it will adhere to the conditions applied to Mr Boyd's employment. In particular, it will ensure a clear separation between his work with the company and his responsibilities in Crown service.
10. The remaining conditions below prevent him from making improper use of privileged access to information, contacts and his influence to the company's unfair advantage.
11. The Committee advises, under the government's Business Appointment Rules, that Mr Boyd's role with **Total Flow** should be subject to the following conditions:

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

- 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;
- 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 Total Flow (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 contacts to influence policy, secure business/funding or otherwise unfairly advantage Total Flow (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service, he should not provide advice to Total Flow (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 its arm's length bodies; and
- for two years from his last day in Crown service he should not advise Total Flow including parent companies, subsidiaries, partners and clients) on the UK government's property estate/portfolio, or UK government property decisions he had specific involvement in or responsibility for as Chief Executive, Government Property Agency; nor where he had a relationship with the relevant client in Crown service.

12. 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' Interests³. 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.

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

³ 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.

under the Official Secrets Act, the Ministerial Code/ Civil Service Code or otherwise.

14. 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.”
15. Mr Boyd 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 her role with the organisation as depending on the circumstances, it might be necessary for him to seek fresh advice.
16. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee’s website.

Committee Secretariat

Annex - Material Information

The role

1. Total Flow is an international consultancy that enables 'sustained high performance in business and government', 'the catalysing of markets and collaborative ventures' and 'the accelerated growth and industrialisation of start-ups and scale-ups'. Total Flow offers services of four kinds:
 - management consulting;
 - managed services;
 - interim leadership; and
 - joint ventures.
2. Mr Boyd wishes to take up a paid, part-time role with Total Flow as a Consultant. Mr Boyd said that his role would involve:
 - engaging with clients as a representative;
 - supporting clients in delivering their strategy and realising value;
 - advising on building capability and capacity;
 - advising on shaping and initiating major programmes of change;
 - advising on collaborative approaches to major programme delivery; and
 - mentoring programme managers.
3. Mr Boyd said that his role would not involve any contact with government.
4. Mr Boyd stated that he has worked in built environment, property and infrastructure for his whole career. Prior to his role as Chief Executive at the GPA, he was HMRC's Estates Director delivering 13 major office buildings, planning the successful drawdown of a nationwide PFI⁴, and shrinking the size of the estate by two thirds. He also served in the British Army including leading its in-house engineering design and project management consultancy, and as its Director of Infrastructure ⁵.

Dealings in office

5. Mr Boyd said that he did not make any policy, regulatory or commercial decisions specific to Total Flow while in office. He said that he did not meet with the company and there is no relationship between Total Flow and his former

⁴ Private Finance Initiatives - which allow governments and the private sector to join forces to finance and implement projects that benefit the public sector. ⁵ <https://www.gov.uk/government/people/steven-boyd>

department. Mr Boyd noted that he had met with other consultancies that could be seen as competitors of Total Flow whilst in office. However, he was not involved in managing their work with government, which fell to others in his team.

Departmental assessment

6. The GPA and Cabinet Office confirmed the details Mr Boyd provided and confirmed that:

- he was not involved in decisions specific to Total Flow;
- he did not meet with Total Flow while in office, nor is there a known relationship between government and Total Flow;
- while Mr Boyd met with other consultancy firms in office and was therefore aware of their work with GPA, given the size of the market the departments saw no particular risk under the Rules.
- there is no information he had access to that the departments considered would offer Total Flow/ its clients an unfair advantage.

7. The GPA and Cabinet Office recommended the standard conditions.