



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Sir Alex Chisholm KCB, former Chief Operating Officer for the Civil Service and Permanent Secretary for the Cabinet Office. Paid appointment with Canadian Pension Plan Investment Board.

1. Sir Alex sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for former Crown servants (the Rules) on an appointment he wishes to take up with the Canadian Pension Plan Investment Board (CPPIB) as a Senior Advisor.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during Sir Alex's time in office, alongside the information and influence a former senior Crown servant may offer CPPIB. 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. CPPIB is a Canadian Crown corporation established by way of the 1997 Canada Pension Plan Investment Board Act to oversee and invest funds on behalf of the Canada Pension Plan. In his proposed role as Senior Advisor, Sir Alex's responsibilities involve advising CPPIB on the wider macro-economic environment and market conditions in infrastructure sectors.
6. Sir Alex was not involved in decisions specifically affecting CPPIB, nor did he meet with the company while in government service. Therefore, the Committee² considered the risk that he could reasonably be seen to have been offered this role as a reward for decisions made or actions taken in office, was low.
7. As the Chief Operating Officer for the Civil Service and Permanent Secretary for the Cabinet Office, Sir Alex held one of the most central and influential roles within the Civil Service. As such, there are risks associated with his access to information from his time in government. The risks here are limited given that there is no direct overlap between his role in government and proposed role with CPPIB. Furthermore, the Cabinet Office considered the 12 months, plus the change in government priorities since he left office, mean his access to information is unlikely to be sufficiently up to date to provide an unfair advantage to CPPIB.
8. All former senior Crown servants are prevented from lobbying the UK government for two years after leaving office. Sir Alex confirmed that he does not expect his role as Senior Adviser to have any dealings with the UK government, though the government might invite him to attend events. Contact instigated by government departments/officials would be in keeping with the lobbying ban that applies.

The Committee's advice

9. The Committee determined the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear that Sir Alex must not make use of any privileged access to information, contacts or influence gained from his time in government to the unfair advantage of CPPIB.
10. The Committee's advice, under the government's Business Appointment Rules, is that this appointment with the **Canadian Pension Plan Investment Board** should be subject to the following conditions:

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

- 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 the Canadian Pension Plan Investment Board (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 the Canadian Pension Plan Investment Board (including parent companies, subsidiaries, partners and clients); and
 - for two years from his last day in Crown service, he should not provide advice to the Canadian Pension Plan Investment Board (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.
11. 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.
12. 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/Civil Service Code or otherwise.
13. 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*

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.

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.'

14. Sir Alex 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 his role with the organisation as depending on the circumstances, it might be necessary for him to seek fresh advice.
15. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Hamzah Rizvi
Committee Secretariat

Annex - material information

The role

1. CPPIB is a Canadian Crown corporation established by way of the 1997 Canada Pension Plan Investment Board Act to oversee and invest the funds contributed to and held by the Canada Pension Plan (CPP). According to its website, CPPIB invests in public companies in the UK and Europe,⁴ along with private equity,⁵ infrastructure and real estate investments.
2. In his paid, part-time role as Senior Advisor, Sir Alex stated that he will be asked to comment on macro-economic environment and market conditions in infrastructure sectors, in order to help inform the executive management's investment policies and commitments.
3. Sir Alex confirmed his role is not government-facing and typically will not involve contact with the UK government, though there may be instances in which the government requests his attendance at events.

Dealings in office

4. Sir Alex stated that he did not meet with, nor was he involved in any policy, commercial or regulatory decisions specific to CPPIB during his time in government service. Furthermore, he stated that he does not possess sensitive information that may provide an unfair advantage.

Departmental assessment

5. The Cabinet Office confirmed the details provided by Sir Alex and that:
 - the department does not hold a relationship with the CPPIB;
 - there is some risk, real or perceived, of Sir Alex retaining a wide range of information that may be beneficial for CPPIB. This risk, however, is somewhat diminished as it has been over a year since he left Crown service, and there has been a change in government and priorities, as well as international developments, since he left service – the currency of information that he may retain is therefore limited.

⁴ https://www.cppinvestments.com/wp-content/uploads/2024/05/Foreign-Publicly-Traded-Equity-Holdings_ibfs-Q4F24.html

⁵ https://www.cppinvestments.com/wp-content/uploads/2025/02/PI_Holdings_EN_Q3F25.html

6. The Cabinet Office noted the perceived risk of lobbying on Sir Alex's proposed employer's behalf – specifically that, as a former senior government official, there is a risk he may use his privileged understanding of contracts within government, as well as his contacts within government, to CPPIB's unfair advantage.
7. The Cabinet Office recommended the standard conditions apply for Sir Alex's appointment and noted Sir Alex's duty to maintain the confidentiality of any retained knowledge of privileged information during his time in Crown service.