



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

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BUSINESS APPOINTMENT APPLICATION FOR ADVICE: Lucy Noakes OBE, former Press Secretary at No.10 and, previously, Special Adviser – Press Lead for the Deputy Prime Minister at the Cabinet Office. Paid appointment with Helsing Limited.

1. Ms Noakes sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for former Crown Servants (the Rules) about taking up a role with Helsing Limited (Helsing UK) as Head of Communications.
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 taken by Ms Noakes during her time in office, alongside the information and influence she may offer Helsing UK. 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.

The Committee's consideration of the risks presented

5. Helsing is a German-based artificial intelligence firm, operating in the defence sector, with a presence in the UK – known as Helsing UK. It uses artificial intelligence in developing and implementing methods of security and data

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.

processing for democratic governments. It has several contracts with the UK government.

6. Ms Noakes did not meet with Helsing UK while in office and applied to the role via open advertisement. In addition, she did not have a decision-making role in the Cabinet Office on matters specific to Helsing UK or the sector it operates in. Therefore, the Committee² considered that the risk that this role could reasonably be perceived as being offered as a reward is low.
7. As the former Press Secretary at No.10 and, previously, Special Adviser – Press Lead for the Deputy Prime Minister, Ms Noakes had access to sensitive information which may be seen to benefit any company she chooses to join. The Committee considered it significant that this is a general risk; her former department is not aware of any particular information she had access to which would raise a risk under the Rules. As noted by the department, there are factors that further reduce the risks of any information she was privy to:
 - its currency has been reduced by the time that Ms Noakes has been out of office – over a year, during which there has been a change of government;
 - her access to it would have been shortly before its release into the public domain; and
 - it is unlikely to have overlapped with the defence AI sector in which Helsing UK operates.
8. There are risks associated with Ms Noakes's influence and network of contacts within government. Her role as Helsing UK's Head of Communications could be construed as seeking to influence the government on Helsing UK's behalf – which would be contrary to the lobbying ban that applies to all former senior civil servants for two years on leaving office. Ms Noakes said that her role will not involve any formal contact with the UK government and will be focussed on communications and media handling. It is significant that Helsing UK confirmed that:
 - it will adhere to the Rules and the conditions of this advice;
 - Ms Noakes will not lobby government whilst subject to the Rules;
 - any lobbying activity would fall to others employed by the company in the Communications and Government Affairs function; and
 - Ms Noakes' role may include engagement with the UK government on joint communications activities, but this would be on a collaborative basis at the request of the UK government and explicitly separated from the activities restricted by the conditions.

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

The Committee's advice

9. There are risks associated with her general access to sensitive information and potential influence within government – though the Committee did not consider this appointment raises any particular propriety concerns under the government's Rules.
10. Ms Noakes confirmed there will be no lobbying of the government in this role, in line with the expectations set out in the Rules. However, there remains a risk she may be perceived to offer Helsing UK unfair access to government. Therefore, the Committee's advice is that Ms Noakes should not initiate any engagement with the UK government on Helsing UK's behalf. Any contact initiated by the government would not be contrary to the Rules or this advice. It is significant that Helsing UK has confirmed compliance with this advice.
11. The conditions outlined below seek to prevent the improper use of privileged information, contacts or influence to the unfair advantage of Helsing UK. These appropriately mitigate the risks in this appointment.
12. In accordance with the government's Business Appointment Rules, the Committee advises Ms Noakes' appointment with **Helsing Limited** should be 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 UK government or any of its arm's length bodies on behalf of Helsing Limited (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 contacts to influence policy, secure business/funding or otherwise unfairly advantage Helsing Limited (including parent companies, subsidiaries, partners and clients);
 - for two years from her last day in Crown service, she should not provide advice to Helsing Limited (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; and
 - for two years from her last day in Crown service, she should not initiate engagement with the UK government or its arm's length bodies on behalf of Helsing Limited (including parent companies, subsidiaries, partners and clients).

13. The advice and the conditions under the government's Business Appointment Rules relate to her 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.³ 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.
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. Ms Noakes must inform us as soon as she takes up this work or if it is announced that she will do so. Similarly, she must inform us if she proposes to extend or otherwise change her role with the organisation as depending on the circumstances, it might be necessary for her to seek fresh advice.
17. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Yours sincerely

Emily Gillman
Committee Secretariat

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 your 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.

Annex – Material Information

The role

1. Helsing is a German-based artificial intelligence firm, operating in the defence sector, with a presence in the UK – known as Helsing UK. It uses artificial intelligence in developing and implementing methods of security and data processing for democratic governments. Helsing describes itself as working with governments and industry partners to transform the capabilities of existing hardware assets. It has five products:
 - Altra: Altra intelligently connects all elements of the battlefield to transform the accuracy, speed and robustness of land forces. It appears to be focused on increasing acquisition and precision of targeting, via drones etc.
 - HX-2: a software-defined strike drone. Onboard AI prevents hostile electronic warfare. A human operator stays in or on the loop for all critical decisions. HX-2 is in the production stage with some of the core tech already in use in Ukraine.
 - Cirra: addresses anti-aircraft radars, helping pilots and aircrafts to classify and read the intent of unknown anti-aircraft emitters.⁴
 - Project Centaur: a large-scale AI initiative to develop autonomous air combat capabilities including, for example, FCAS, GCAP and other advanced air combat programmes across Europe.⁵ It is in development.
 - SG-1 Fathom and Lura: SG-1 Fathom and Lura are technologies designed to work together to monitor underwater areas for potential threats – aimed at navies. SG-1 is an underwater glider deployable in large numbers for subsurface surveillance and Lura is an advanced AI software system for operating multiple SG-1 Fathom's at once.
2. The UK signed a treaty with Germany in October 2024 (UK-Germany Trinity House Agreement on Defence) – securing defence cooperation across all domains; land, sea, air, cyber, and space.⁶ This includes major investments in the defence industry by Helsing. The new cooperation is focused on, amongst other things, industrial cooperation via a new investment of £350 million into

⁴ Devices that simulate the signatures of hostile aircraft and missiles, allowing pilots to practice identifying and reacting to combat situations safely.

⁵ FCAS and GCAP are advanced air combat programs, with FCAS (Future Combat Air System) being a UK-led initiative focusing on a next-generation combat air capability, including crewed and uncrewed aircraft, while GCAP (Global Combat Air Programme) is a trilateral partnership between the UK, Japan, and Italy to develop a next-generation crewed combat aircraft.

⁶ www.gov.uk/government/news/landmark-uk-germany-defence-agreement-to-strengthen-our-security-and-prosperity

the UK for the development of AI systems, confirmed by Helsing.⁷

3. Helsing UK has four contracts with the UK government to provide cloud software for AI use in land,⁸ infrastructure,⁹ maritime¹⁰ and air¹¹ – all awarded in October 2024. These contracts sit under the G-Cloud-14 agreement (an online catalogue for all public sector organisations and charities to buy cloud-based computing services), which ends on 28 April 2026.
4. Ms Noakes told the Committee she wishes to take up a full-time, paid role with Helsing UK. As Head of Communications for Helsing UK, her role will involve:
 - media handling and managing communications for Helsing UK; and
 - leading Helsing UK's media engagement – issuing press releases, guiding senior leaders on media, building relationships with journalists and handling any incoming media queries.
5. Ms Noakes said there will be no formal contact with government in this role, but she may have informal contact at events or manage the media for events that government attends. She told the Committee there is a separate Government Relations post, which will lead interaction between Helsing UK and government.

Correspondence with Helsing UK on compliance

6. Ms Noakes' proposed employer confirmed, in writing, its understanding of and agreement to comply with the Committee's advice. Helsing UK stated that:
 - *'Please consider this written confirmation that Helsing Limited acknowledges the conditions imposed upon Ms Noakes' employment and commits to adhering with them for the remaining period in which they apply.'*
 - *Ms Noakes is being employed as UK Head of Communications and as such the role will not involve the lobbying of the UK government, seeking to influence policy, securing business or funding, or participating in contract bids.*
 - *Ms Noakes's role may involve engagement with the UK government on joint communications activities, but this would be on a collaborative basis at the request of the UK government and explicitly separated from the activities restricted by ACOBA's conditions on her employment.*

⁷ www.janes.com/osint-insights/defence-news/air/helsing-to-mass-produce-ai-enabled-hx-2-uav-in-uk

⁸ www.applytosupply.digitalmarketplace.service.gov.uk/g-cloud/services/902635197281891

⁹ www.applytosupply.digitalmarketplace.service.gov.uk/g-cloud/services/902635197281891

¹⁰ www.applytosupply.digitalmarketplace.service.gov.uk/g-cloud/services/859609441290693

¹¹ www.applytosupply.digitalmarketplace.service.gov.uk/g-cloud/services/142588692290392

- *This has been communicated in writing to Ms Noakes and aligns with Helsing’s enduring commitment to adhere with ACOBA guidance, facilitated by the separation of Communications and Government Affairs functions within the company.’*

Dealings in office

7. Ms Noakes told the Committee that she did not meet with Helsing UK during her time in office. She said she did not have involvement in any policy, commercial, funding or regulatory decisions, nor had access to sensitive information specific to Helsing UK.
8. Ms Noakes noted some overlap with the defence sector and her previous role in the Cabinet Office with the Resilience workstream,¹² but stated she was not involved with defence policy or contracts.

Departmental assessment

9. The Cabinet Office confirmed the details provided by Ms Noakes above and stated she would have been privy to a wide range of policy and governmental knowledge that could be relevant to the proposed employer. It considered the risks associated with this information are limited by the following factors:
 - she did not have access to information specific to Helsing UK;
 - she would have had access to information shortly before its release into the public domain as opposed to deep knowledge of developing policy;
 - it considered her access to information unlikely to have overlapped much with the defence AI sector in which Helsing UK operates; and
 - there has been a change of government and it has been over one year since her departure from government.
10. The Cabinet Office said it is highly unlikely Ms Noakes would have had access to any commercially sensitive information relevant to the sector of defence AI that Helsing UK operate in.
11. The Cabinet Office could not rule out that she met with competitors of Helsing UK, as the transparency data for meetings only provides meetings with senior members of the media.
12. The Cabinet Office did not state a departmental relationship with Helsing UK. The department noted that Jeremy Quin, as the Paymaster General and Minister for the Cabinet Office, visited Helsing to congratulate it on receiving private investments worth £100m in early February 2023.

¹² The UK Government Resilience Framework was published in December 2023 and sets out how the UK will strengthen systems and capabilities that support its collective resilience – www.gov.uk/government/publications/the-uk-government-resilience-framework

13. The Cabinet Office said it is not aware of contract details, but noted that Helsing is closely aligned with the MOD.
14. The Cabinet Office noted that Helsing has recently retained the services of consultant lobbyists Headland Consultancy Ltd (October to December 2024), having been a client of Hanbury in the past.
15. The Cabinet Office recommended the standard conditions.