

OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Dr Simon Case CVO, former Cabinet Secretary and Head of the Civil Service at the Cabinet Office. Paid commission with Bridgepoint Group plc under your independent consultancy.

- You 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 taking up a commission with Bridgepoint Group plc (Bridgepoint) under your independent consultancy.
- 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 your time in government service, alongside the information and influence you, as the former Cabinet Secretary, may offer Bridgepoint. The material information taken into consideration by the Committee is set out in the annex.
- The Committee has advised that a waiting period and a number of conditions be imposed to mitigate the potential risks to the government associated with this appointment under the Rules. This is not an endorsement of this appointment in any other respect.
- 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

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.

- 5. The Committee² considered this commission to be broadly consistent with the description of your independent consultancy which was described as providing advisory services on senior leadership and strategy questions across a range of sectors.
- 6. Bridgepoint is a UK-based private equity and asset management firm which operates across various sectors like advanced industrials, technology, business & financial services, and healthcare. It is primarily regulated by the Financial Conduct Authority (FCA).
- 7. There is no relationship between Bridgepoint and your former department and you did not meet with, nor were you involved in any decisions specific to Bridgepoint whilst you were in government service. Therefore, the Committee considered the risk this work could reasonably be perceived as a reward for decisions made in office is low.
- 8. As the former Cabinet Secretary and Head of the Civil Service, you held privileged insight into government's policy options and wider strategic thinking that were being considered until relatively recently. As such, the Committee considered that there is risk associated with your access to information. The Cabinet Office did not consider you to possess any specific information that may confer an unfair advantage to Bridgepoint. It is also relevant that it has been over five months since you left office, placing a gap between your access to information and taking up this role.
- 9. As a former senior Crown servant, there is a risk that you might be seen to offer unfair access to, and influence within, government. You confirmed your commission with Bridgepoint excludes any dealings with the UK government.

The Committee's advice

- 10. The Committee determined the risks identified can be appropriately mitigated by the conditions below which were attached to your independent consultancy. These conditions make it clear that you must not make use of privileged information, contacts or influence gained from your time in Crown service to the unfair advantage of Bridgepoint under your independent consultancy.
- 11. The conditions below also remind you that you must not make use of privileged insight gained from your ongoing role with wider government, as the Independent Chair of the Barrow Delivery Transformation Fund.
- 12. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this commission with

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

Bridgepoint Group plc should be subject to the same conditions applied to your independent consultancy:

- a waiting period of six months from your last day in government service;
- you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in Crown service - which extends to any other role in which you continue to represent the UK government and its arm's length bodies;
- for two years from your last day in Crown service, you should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of Bridgepoint Group plc (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Bridgepoint Group plc (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in Crown service, you should not provide advice to or on behalf of Bridgepoint Group plc (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;
- for two years from your last day in Crown service, you should not become personally involved in lobbying contacts you developed during your time in Crown service in other governments and organisations for the purpose of securing business and investments for Bridgepoint Group plc; and
- for two years from your last day in Crown service, before accepting any commissions for your independent consultancy and or/before extending or otherwise changing the nature of your commissions, you should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.
- 13. The advice and the conditions under the government's Business Appointment Rules relate to your 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.

- 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 Ministerial Code or otherwise.
- 15. The Business Appointment Rules explain that the restriction on lobbying means that you '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 employment with this organisation, 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.

Yours sincerely,

Hamzah Rizvi
Committee Secretariat

Annex - material information

The role

1. You stated this is a commission under your independent consultancy, which provides advisory services on senior leadership and strategy questions. Clients

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.

- may be in the technology sector, education sector, financial services and charitable sector.
- 2. According to its website, Bridgepoint Group plc is a UK-based private equity and credit fund manager, investing in middle-market businesses across various sectors like advanced industrials, technology, business & financial services, and healthcare. It has a global presence with local teams in Europe, North America, and Asia. As an asset management firm, it is regulated by the Financial Conduct Authority⁴.
- 3. You noted this commission involves you providing:
- specialist advice to help inform Bridgepoint Group's approach to geopolitical risk, ensuring it remains well-informed in an evolving global landscape.
- help to define a group-level perspective on key issues or, at minimum, ensuring strategic awareness of likely developments, advising senior leadership on major geopolitical trends, risks, and opportunities.
- tailored insights ahead of major corporate moments.
- offering ad hoc guidance in response to emerging world events.
- attending two or three private events with investors and/or shareholders to share high-level geopolitical insights
- 4. You also stated:
- your commission with Bridgepoint will explicitly not involve any interaction with government
- the company does not have any contracts with, nor provides services to, the government (nor has it any intentions of doing so), nor does it lobby the government (nor does it have any intentions of doing so).
- 5. You stated the commission opportunity came as a result of general conversations with Bridgepoint which began after you left government service.

Ongoing role with government

6. You are the Independent Chair of the Barrow Delivery Transformation Fund⁵, a £200m government package to deepen and develop Barrow's crucial role at the heart of UK national security and nuclear submarine-building, overseen by the Defence Nuclear Enterprise.

Dealings in office

⁴ https://register.fca.org.uk/s/firm?id=001b000000MfHheAAF

⁵ https://www.gov.uk/government/news/simon-case-takes-leading-role-in-plan-to-transform-barrow

7. You informed the Committee that you did not meet with, were involved in policy, regulatory or commercial decisions, and did not hold sensitive information specific to Bridgepoint.

Departmental assessment

- 8. The Cabinet Office confirmed you did not meet with, nor did you have involvement in decisions specific to Bridgepoint during your time in government service.
- 9. The Cabinet Office stated that you held one of the most central and influential roles within the civil service, and thus would have had broad access to government policy in development and wider strategic thinking which could be perceived to be of assistance to those you work with as part of your independent consultancy. However, the department is not aware of any specific information you were privy to that would likely present an unfair advantage to Bridgepoint.
- 10. The Cabinet Office noted your duty to maintain the confidentiality of any retained knowledge of privileged information of the inner workings of government or knowledge of policy development during your time in Crown service.
- 11. The Cabinet Office recommended the standard conditions that apply to an independent consultancy apply to appropriately mitigate the risks considered.