



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Robert Courts KC, former Solicitor General at the Attorney General's Office. Paid commission with Northrop Grumman UK Limited under your independent consultancy – Ascalane Partners Ltd.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) on taking up a commission with Northrop Grumman UK Limited (Northrop Grumman UK) under your independent consultancy, Ascalane Partners Ltd.
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 during your time in office, alongside the information and influence you may offer Northrop Grumman 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 former ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers 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. The Committee² considered this commission to be broadly consistent with the description of your consultancy – providing strategic counsel to clients on corporate strategy, strategic analysis, including on the broad political landscape and public policy as well as advising clients on other subject matters, as noted in the annex below.
6. Northrop Grumman UK is the British arm of the US-based Northrop Grumman Corporation, a global aerospace and defence contractor. The company provides advanced technology solutions across defence, security, and intelligence domains. It specialises in areas such as cyber, command and control systems, air traffic management, unmanned systems, and maritime navigation. Northrop Grumman UK provides critical cyber capabilities to the UK government and its systems empower strategic UK defence assets for the Ministry of Defence as well as playing a key role in the AUKUS³ security partnership, supporting both pillars with established presences in all three AUKUS nations⁴.
7. There is no known overlap with your recent ministerial role as Solicitor General, and Northrop Grumman UK. You did not meet with, nor were you involved in, policy, regulatory or commercial decisions specific to Northrop Grumman during your time in office. Therefore, the Committee considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.
8. The Attorney General's Office (AGO) noted that, as the former Solicitor General, you would have had access to legally privileged information and insight. The Committee agreed with the AGO that the risk this could offer an unfair advantage is limited because:
 - you are subject to the Law Officers' Convention – any information you may possess is subject to legal professional privilege, and neither the existence nor content of any Law Officers' advice should be disclosed outside government without the Law Officers' explicit consent;
 - the relevant policy areas of interest to Northrop Grumman UK are held by the Ministry of Defence – which sat outside of your recent scope of responsibilities; and

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

³ AUKUS is a trilateral security partnership between Australia, the United Kingdom, and the United States intended to promote a free and open Indo-Pacific.

⁴ committees.parliament.uk/writtenevidence/142271/pdf/#:~:text=Northrop%20Grumman%20UK,-.About%20Northrop%20Grumman.Ministers'%20meeting%20in%20December%202023

- it has been 12 months and a change in government administration since you left office – providing a gap that reduces the currency of information you may possess.
9. As with any former minister, there are risks associated with your contacts and influence within government – with the potential for Northrop Grumman UK to gain unfair access or influence as a result. You confirmed the work of Ascalane Partners Ltd, and specifically your commission with Northrop Grumman UK, excludes any dealings with government, reducing the risk you could be perceived to be lobbying government – which all former ministers are prevented from doing for two years after leaving office.

The Committee's advice

10. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These seek to prevent you from making use of privileged information, contacts and influence gained from your recent time in ministerial office to the unfair advantage of Northrop Grumman UK, under Ascalane Partners Ltd.
11. The Committee advises, under the government's Business Appointment Rules, that this commission with **Northrop Grumman UK Limited** should be subject to the same conditions applied to your independent consultancy:
- 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 ministerial service;
 - for two years from your last day in ministerial service, you should not become personally involved in lobbying government or any of its arm's length bodies on behalf of Northrop Grumman UK Limited (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Northrop Grumman UK Limited (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial service, you should not provide advice to Northrop Grumman UK 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 and its arm's length bodies;
 - for two years from your last day in ministerial service, you should not become personally involved in lobbying contacts in other governments and organisations that you developed during your time in office for the purpose of securing business and/or investment opportunities for

Northrop Grumman UK Limited; and

- for two years from your last day in ministerial office, 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.
12. 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' Interests⁵. 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 under the Official Secrets Act, the 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. 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.
 16. 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.

⁵ 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.

Isabel Doverty

**Interim Chair
ACOBA**

Annex - material information

1. You stated this is a commission under your independent consultancy, Ascalane Partners Ltd – which provides strategic counsel to clients on:
 - corporate strategy
 - strategic analysis, including on the broad political landscape and public policy
 - operational practices and ways of working
 - campaigns
 - messaging
 - media presentation, including crisis communications
 - general coaching around parliamentary appearances, such as Select Committees
 - analysis, support and advice to clients on UK public policy and regulatory developments and the broader political landscape which may affect their interests, where relevant.

2. You stated Ascalane Partners would never disclose privileged information from your time in government and would not:
 - lobby government ministers or officials, nor have any engagement with government on behalf of clients.
 - seek to draw on your network of contacts in government.
 - have involvement with bids or contracts involving government.

3. Northrop Grumman UK is the British arm of the US-based Northrop Grumman Corporation, a global aerospace and defence contractor. The company provides advanced technology solutions across defence, security, and intelligence domains, specialising in areas such as cyber, command and control systems (C4ISR), air traffic management, unmanned systems, and maritime navigation. Northrop Grumman has a relationship with the UK government, particularly within the defence and security sectors. In the UK, it delivers mission-critical capabilities to the Ministry of Defence and wider government, along with a strategic role in enhancing national security, modernising armed forces, and sustaining high-value engineering and digital jobs across the country. Northrop Grumman UK provides critical cyber capabilities to the UK government and its systems empower strategic UK defence assets including the Royal Air Force's F-35 Lightning II and the Royal Navy's aircraft carriers, Type-45 destroyers and submarine fleet. Northrop

Grumman also plays a key role in the AUKUS security partnership, supporting both pillars with established presences in all three nations ⁶.

4. You stated your role as Senior Consultant involves the provision of Ascalane's consultancy services relating to Northrop Grumman's defence strategy and services in the UK, to cover strategic positioning and policy. This is in line with the description provided of Ascalane's consultancy work, specifically:

'Analysis, support and advice to clients on UK public policy and regulatory developments and the broader political landscape which may affect their interests, where relevant.'

5. You stated that your defence-related expertise comes from your policy work on the backbenches, constituency work as a former Member of Parliament and from your experience as Aviation Minister at the Department for Transport (a role you held two years ago). In your former role as an MP, you sat on the Defence Committee from 25 October 2022 to 12 December 2023, as well as Chair of the Defence Committee from 25 October 2023 to 12 December 2023.

Dealings in office

6. Of your time as Solicitor General, you stated that:
 - you did not meet with, nor were involved in any policy, commercial or regulatory decisions specific to Northrop Grumman.
 - you added that the relevant policy matters were held by the Ministry of Defence, not your former department – the AGO.
 - in relation to your access to information, you stated that you would not have been privy to confidential or privileged information as Solicitor General that could offer an unfair advantage to Northrop Grumman.

Departmental assessment

7. The AGO confirmed the details you provided and stated the following in relation to your time as Solicitor General:
 - you were not involved in decisions specific to Northrop Grumman;
 - the department does not hold a relationship with Northrop Grumman;
 - and

⁶ committees.parliament.uk/writtenevidence/142271/pdf/#:~:text=Northrop%20Grumman%20UK,-.About%20Northrop%20Grumman.Ministers'%20meeting%20in%20December%202023

- you had access to confidential and legally privileged information which if disclosed inappropriately could be considered to offer an unfair insight/advantage to Northrop Grumman.
8. The AGO considered the risk relating to legally privileged information you held to be mitigated by the standard conditions. It also noted:

'In addition to legal privilege, Law Officers' advice is subject to the Law Officers' Convention, which provides that neither the existence nor content of any Law Officers' advice should be disclosed outside government without the Law Officers' explicit consent.'