



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: General Sir Patrick Sanders KCB CBE DSO ADC OBE, former Chief of the General Staff at the Ministry of Defence (MOD). Paid appointment with Banco Santander.

1. General Sir Patrick 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 his proposal to work with Banco Santander, S.A. (Banco Santander) as a Senior Strategic Adviser.
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 taken by General Sir Patrick during his time in office, alongside the information and influence he may offer Banco Santander. 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 risk presented

5. Banco Santander is a multinational financial services company providing a wide range of financial services, including retail, commercial, corporate, and investment banking, wealth management and insurance solutions. General Sir

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.

Patrick proposes to join the bank as a Senior Strategic Adviser - providing the board with strategic advice on geopolitics, international risk and defence and security. General Sir Patrick seeks to join Banco Santander as a Senior Strategic Adviser, providing strategic advice on geopolitics international risk and defence and security specific topics.

6. There is a general overlap between General Sir Patrick's former responsibilities at the Ministry of Defence (MOD) and this role, given the company's interest in the impact of defence and security on its business; and it services clients in the sector. General Sir Patrick made no decisions specific to Banco Santander while in office and the company is not a particular stakeholder of the MOD and its operations. The Committee² therefore considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office was low.
7. As former Chief of the General Staff, General Sir Patrick had access to a wide range of privileged information at the heart of government. This could provide an unfair advantage to any organisation, but the risk is particularly relevant here as Banco Santander services clients in defence and security. For example, privileged insight into key future requirements and capabilities within the UK MOD and in the wider defence industry.
8. The Committee agreed with the MOD that there are some limiting factors:
 - the MOD identified no specific information likely to unfairly advantage Banco Santander;
 - it has been over a year since he left his post, and since then, there has been a change of government and the Strategic Defence Review 2025 has been published, reducing the currency of information he holds.
9. Whilst this is a strategic role, rather than client facing, there remains a potential risk of overlap with matters he had material involvement, and therefore knowledge of, during his time in office. This is most likely to arise where the advice he is asked for or provides directly relates to UK defence.
10. The Committee also considered the risk of unfair influence. General Sir Patrick's former role means he has an extensive network of contacts within the UK government and the MOD.

The Committee's advice

11. The Committee considered that General Sir Patrick's role in the MOD presents real and perceived risks associated with his access to information, though limited for the reasons set out above. This is most likely to arise in

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

relation to the company's business, or potential business, in the UK defence industry. The Committee has therefore imposed a condition which prevents him from advising on UK defence.

12. The Committee advises, under the government's Business Appointment Rules, that General Sir Patrick's role with **Banco Santander, S.A.** should be subject to the following conditions:

- 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 Banco Santander, S.A. (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Banco Santander, S.A. (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service, he should not provide advice to Banco Santander, S.A. (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of the UK government, the MOD or its trading funds; and
- for two years from his last day in Crown service, he should not advise Banco Santander, S.A. (including parent companies, subsidiaries or partners) or its clients on the UK defence market.

13. The advice and the conditions under the government's Business Appointment Rules relate to General Sir Patrick'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.

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,

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.

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. General Sir Patrick must inform us if and when he takes up this role or if it is announced that he will do so. He must also inform us if he proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him 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,

Madeleine Crowther
Committee Secretariat

Annex – material information

The role

1. Banco Santander, S.A., trading as Santander Group, is a Spanish multinational financial services company based in Santander, Spain, with operational headquarters in Madrid. It is the 14th-largest banking institution in the world, operating in Europe, North and South America and Asia. The company provides a wide range of financial services, including retail, commercial, corporate, and investment banking, as well as wealth management and insurance solutions.
2. General Sir Patrick wishes to take up a part-time, paid role with Banco Santander as a Senior Strategic Adviser. General Sir Patrick said his role would involve providing strategic advice on geopolitics international risk and defence and security specific topics. He confirmed he would have no contact with government.

Information in the public domain

3. The Strategic Defence Review 2025^{4,5,6} – Published on 2 June 2025. The Strategic Defence Review 2025 (SDR) sets out the pathway to transform Defence in the UK – with a vision that, by 2035, UK Defence will be ‘a leading tech-enabled defence power, with an Integrated Force that deters, fights, and wins through constant innovation at wartime pace.’

Dealings in office

4. General Sir Patrick advised the Committee that he did not meet with Banco Santander whilst in office. He said he did not have involvement in any policy development or decisions that would have been specific to the company, and held no commercial or contractual responsibilities relating to it.

Departmental assessment

5. The MOD confirmed the details General Sir Patrick provided.
6. The MOD said he had insight at the highest levels on the areas for which he held responsibility. However, he made no decisions in office specific to Banco Santander nor did he have access to privileged information that could offer

⁴ <https://www.gov.uk/government/publications/the-strategic-defence-review-2025-making-britain-safer-secure-at-home-strong-abroad>

⁵ <https://www.gov.uk/government/publications/the-strategic-defence-review-2025-making-britain-safer-secure-at-home-strong-abroad/the-strategic-defence-review-2025-making-britain-safer-secure-at-home-strong-abroad#the-integrated-force-a-force-fit-for-war-in-the-21st-century-1>

⁶ <https://www.gov.uk/government/speeches/strategic-defence-review-oral-statement#:~:text=Committing%20the%20largest%20sustained%20increase.3%25%20in%20the%20next%20parliament>

Banco Santander an unfair advantage.

7. The MOD recognised that General Sir Patrick has contacts and influence at the highest levels of UK Defence and within international governments.
8. The department recommended that further to the standard conditions, General Sir Patrick's role should be limited so that he is prevented from advising on the UK Defence industry or on matters which he had specific responsibility for at the MOD.