

## OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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## **GENERAL SIR DAVID RICHARDS**

The Advisory Committee on Business Appointments has considered the application from General Sir David Richards to set up as an independent consultant with an initial five commissions. Sir David's last day in Crown Service was 18 July 2013, so the three-month waiting period usually observed by Permanent Secretary equivalents will expire on 18 October 2013, the day Sir David proposes to start work.

The Committee noted Sir David's consultancy proposes to focus on geo-strategic advice to foreign governments and to companies and organisations working abroad, and possibly in future lecturing more generally on strategy and leadership. The Committee also considered his request for permission to take up consultancy commissions with five clients:

the Brenthurst Foundation; Ondra Partners; and Inter Mediate.

The Committee took into account that Sir David has had no contractual dealings with his prospective clients, or their competitors, and he has not been responsible for anyone who has had such dealings. He has not been involved in decisions or the administration of any policy or regulation relating to his prospective employer or clients. Nor has he had access to any commercially sensitive information about any competitors. He has some official (non-contractual) contact with certain individuals within each organisation, but this has been limited and informal.

The Prime Minister has accepted the recommendation of the Committee that the consultancy and the five commissions should be permitted subject to the following restrictions:

- for two years from his last day of service, Sir David should not become personally involved in lobbying the UK Government on behalf of any of his clients;
- he should not draw on privileged information available to him from his time in Crown Service;

## Members:

- for twelve months from his last day of service he should not undertake any work as a
  consultant which involves providing advice to any company or organisation on the terms of a
  bid or contract relating directly to the work of the MoD or UK Armed Forces; and
- for two years from his last day of service, before accepting any new commission he should make a case directly to the Committee to confirm that each individual commission the applicant wishes to undertake would be permissible under the approved terms of the consultancy. (If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy he will be expected to submit a fresh application).

Lobbying is defined in the Business Appointment Rules in the following way: "Lobbying in this context means that the former civil servant should not engage in communication with Government (including Ministers, special advisers and officials) with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted".

I should be grateful if you would ensure that we are informed as soon as Sir David takes up any of these commissions, or if it is announced that he will do so (I enclose a form for convenience). We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments which have not been taken up or announced, and this could lead to a false assumption being made about whether he had complied with the Rules. Similarly, I should be grateful if you would inform us if he proposes to extend or otherwise change his consultancy as, depending on the circumstances, it may be necessary for him to make a fresh application.

Once the work has been publicly announced or started, we will publish details of this letter on the Committee's website, and include the main details of the appointments, together with the Advisory Committee's advice on them and the date on which they were taken up, in both the regularly updated consolidated list on the website and in the next annual report.

**CONRAD STEEL**