



## OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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### BUSINESS APPOINTMENT APPLICATION: AIR MARSHAL SIR SIMON BOLLOM

The Committee has been asked to consider an application from Air Marshal Sir Simon Bollom, former Chief of Materiel (Air) (COM AIR) in Defence Equipment and Support (DE&S), who would like to establish an independent consultancy and take up commissions with CH2M and KPMG.

Sir Simon was COM AIR between 1 October 2012 and 29 April 2016. His last day in Crown service was 27 September 2016.

As COM AIR Sir Simon led the Air sector and was responsible for the acquisition and support for all fixed wing and fast jet aircraft. He was a member for the Air Force and DE&S Executive Boards, the senior airworthiness engineer and RAF Chief Engineer and was responsible and accountable for the leadership of 12 integrated project teams comprising 1600 personnel with an annual budget of approximately £3.5bn.

Sir Simon is proposing to set up an independent consultancy offering general advisory work on business strategy, project management, and safety engineering with a particular emphasis on aviation. He has registered a company for this purpose called Altus Advisory Limited.

Sir Simon has also been offered the following commissions:

- An assignment with **CH2M** to conduct an independent review of the Highways England Major Projects transformation programme experience. He would also be involved with the sharing of best practice between DE&S and Highways England Major Projects as both are Government bespoke trading entities, run major capital programmes and are undergoing major transformation.
- Five days consultancy with **KPMG** associated with Project Gateway, an Air Command project, which will provide a more efficient and effective delivery at RAF Brize Norton, securing best value for the taxpayer. KPMG is already under contract with the MOD as the project support provider. This is a discrete piece of work, reviewing the project and making recommendations on KPMG's delivery proposals to the RAF.

When considering the consultancy application the Committee took into account that Sir Simon completed his last day as COM AIR on 29 April 2016 before commencing a period of leave. He had no further official duties between that date and 27 September 2016, his last day in Crown service. The Committee also took into account the recommendations of the Countersigning Officer, Commercial Head and MOD panel.

The Committee considered that given the seniority of Sir Simon's position in DE&S, it was appropriate to apply to his consultancy a two-year ban on working in the UK Defence market, although the Committee would be prepared to consider waiving the ban on a case-by-case basis if the specific circumstances of a commission warranted this approach.

When considering the commission with CH2M the Committee noted that the work is not defence-related. It took into account that as a member of DE&S Executive Board Sir Simon was part of the technical assessment team that selected CH2M, Bechtel and PwC for the Materiel Strategy contract. However, CH2M did not bid for the Air element for which Sir Simon was responsible and Bechtel were eventually selected. He did not therefore participate in the CH2M assessment at any level of detail; neither did he have any influence on their selection. The Committee also noted that there are no direct contracts with CH2M in the Air sector.

In relation to the commission with KPMG, the Committee took into account the following matters and concluded that, given these circumstances, it would be appropriate to waive the ban on working in the UK Defence sector for this specific commission:

- This is a discrete piece of work, on one defined project, which is intended to find efficiencies and create value for the taxpayer.
- While there are existing contracts between KPMG and MOD these are outside Sir Simon's operational responsibilities and he has never had any involvement in awarding contracts to KPMG.
- KPMG have added a clause in their contract with Sir Simon to strictly limit the work he may undertake. This limits the work to Programme Gateway for the period specified and precludes him from engaging in any discussions relating to UK defence matters and business development outside Programme Gateway.
- While the MOD is not officially endorsing Sir Simon's assignment, it sees the value in the work Sir Simon will be doing with KPMG and has no concerns about him taking up the role.

The Secretary of State for Defence accepted the Committee's advice that, in accordance with the Government's business appointment rules, Sir Simon's independent consultancy and commissions with CH2M and KPMG be subject to the following conditions:

- For two years from his last day in post he should not provide advice on any supplier that he had dealings with as COM AIR.
- For two years from his last day in post he should not work in the UK Defence market (this condition does not apply to the commission with KMPG in the terms described in this advice);
- For two years from his last day of service he should not undertake any work as a consultant that 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 its trading funds;
- That he should not draw on 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 on behalf of any of his clients or those he advises, nor should he make use, directly or indirectly, of his Government and/or Crown service contacts to influence policy or secure business on behalf of his clients;
- For two years from his last day of Crown service, before accepting any new commission he should make a case directly to the Committee to confirm that each individual commission he wishes to undertake would be permissible under the approved terms of the consultancy; and
- Additionally, in relation to his work with KMPG, Sir Simon will be confined to working on project Gateway and will not attend KPMG meetings on any other work, support them in business development, or give presentations at internal knowledge-sharing events or similar.

The conditions set out above apply to Sir Simon acting either directly or through his company Altus Advisory Limited.

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 or otherwise.

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."

I should be grateful if you would ensure that we are informed as soon as Sir Simon takes up work under his consultancy, or if it is announced that he will do so (I enclose a form for this purpose). 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.

I should also be grateful if you would ask that Sir Simon informs us if he proposes to extend or otherwise change the nature of his consultancy as, depending on the circumstances, it may be necessary for him to make a fresh application.

Once the consultancy has been publicly announced or commissions taken up under it, we will publish this letter on the Committee's website and include the main details of the application, together with the Advisory Committee's advice, in the regularly updated consolidated list on our website and in the next annual report.

Yours sincerely

Nicola Richardson  
Committee Secretariat