



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

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BUSINESS APPOINTMENT APPLICATION: General Sir Nick Carter GCB CBE DSO Gen, former Chief of the Defence Staff at the Ministry of Defence. Paid appointment with the Tony Blair Institute for Global Change (TBI).

1. Gen Sir Nick sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown servants (the Rules) on an appointment he wishes to take up with TBI as a Strategic Adviser, Peace and Security. The material information taken into consideration by the Committee is set out in the annexe.
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 Gen Sir Nick's time in office, alongside the information and influence a former Chief of the Defence Staff may offer TBI.
3. The Committee has advised that a number of conditions be imposed to mitigate the potential risks to the government associated with this appointment under the Rules; this does not imply the Committee has taken a view on the appropriateness of this appointment for a former Crown servant 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 risk 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 Ministry of Defence (MOD) confirmed it has no relationship with TBI: Gen Sir Nick did not meet with TBI whilst in government, nor did he make any decisions specific to the organisation. The Committee² therefore considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.
6. TBI supports policy-makers and governments with strategy, policy and delivery. Whilst Gen Sir Nick has not had access to sensitive information since November 2021, there is a broad overlap given his role in office and the peace and security aspect of this role. The time that has passed since he has last had insight into matters and the international focus of this role helps to mitigate these risks. It is also relevant that Gen Sir Nick is prevented from drawing on privileged information from his time in office and has an ongoing duty of confidentiality.
7. The Committee agreed with the MOD that, as Chief of the Defence Staff, there could be risks associated with Gen Sir Nick's network as he will have gained contacts in the UK and internationally within other governments and private companies. As such there is a risk that Gen Sir Nick's network will be used to the unfair advantage of TBI.

The Committee's advice

8. The Committee determined the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear Gen Sir Nick cannot make use of his access to privileged information, contacts or influence gained from his time in Crown service to the unfair advantage of TBI.
9. The Committee advises under the government's Business Appointment Rules that Gen Sir Nick's appointment with **TBI** 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 TBI (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 TBI (including parent companies, subsidiaries, partners and clients);

² This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Isabel Doverty; Sarah de Gay; Dr Susan Liautaud; The Rt Hon Lord Pickles, Richard Thomas and Mike Weir. Lord Larry Whitty was unavailable.

- for two years from his last day in Crown service, he should not provide advice to TBI (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 and its Arms' Length Bodies, including the Ministry of Defence or its trading funds; and
 - for two years from his last day in Crown service, he should not become personally involved in lobbying contacts he has developed during his time in office in external organisations (including other governments) for the purpose of securing business for TBI (including parent companies, subsidiaries and partners).
10. The advice and the conditions under the government's Business Appointment Rules relate to Gen Sir Nick's previous roles in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. 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.
11. 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.
12. 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*'.
13. Gen Sir Nick must inform us as soon as he takes up employment with this organisation, or if it is announced that he will do so, by emailing the office at the above address. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments that have not been taken up or announced. This could lead to a false assumption being made about whether Gen Sir Nick has complied with the Rules. Gen Sir Nick also needs to 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.
14. 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,

Oli Purnell
Committee Secretariat

Annexe - Material information

The role

1. Gen Sir Nick said he has been offered a paid role as a Strategic Adviser, Peace and Security with the Tony Blair Institute for Global Change (TBI). Gen Sir Nick said TBI is proposing to employ him as a consultant. The role will be to work for 30 days per year.
2. Gen Sir Nick said his role would entail helping *'set strategic direction for the Institute's new offering in Peace and Security, engage with high level hiring decisions within the offering, act as a thought partner for Tony Blair in his role as Executive Chairman and other TBI leaders'*.
3. Gen Sir Nick stated that he is *'not aware of any factors that could affect the perception of this appointment - not least as my role will not be UK facing in terms of government, and nor will I be using the military network I had as CDS to engage at home or abroad'*.
4. Gen Sir Nick said that Tony Blair invited him to assume this role.

Dealings in office

5. Gen Sir Nick advised the Committee he did not meet with TBI 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. He said he did not meet with competitors of the company, nor did he have access to sensitive information regarding these competitors.

Department Assessment

6. The MOD confirmed the details Gen Sir Nick provided.
7. The MOD said Gen Sir Nick had no official contact with TBI whilst a serving officer, and *'[...]therefore this appointment could not be perceived as a reward'*. The MOD also confirmed it has no official relationship with the company.
8. The MOD said as Chief of the Defence Staff, Gen Sir Nick, will have had *'strategic engagement with policy organisations operating in a similar area of business to the Tony Blair Institute, he will not have been involved in any*

commercial detail regarding business arrangements with them, and therefore the risk of perception of unfair detriment to any of the Tony Blair Institute's competitors by this appointment, is low'.

9. The MOD said Gen Sir Nick *'has influence at the highest levels of UK and overseas governments, and in UK defence industry, by virtue of his role as CDS'*. It therefore suggested that suitable restrictions are put in place to mitigate the risk that Gen Sir Nick's appointment provides an undue advantage through his contacts; alongside the standard conditions.