

Cabinet Office

20 November 2025

Unpaid appointment with the Ulster Society for Prevention of Cruelty to Animals (USPCA): Application under the Business Appointment Rules from Baroness Sue Gray CBE, former Chief of Staff at the Prime Minister's Office.

Thank you for submitting an application for advice under the Business Appointment Rules¹ (the Rules) to the Civil Service Commission (the Commission) on behalf of **Baroness Sue Gray CBE**, formerly Chief of Staff at the Prime Minister's Office. The application is for an unpaid role as a **Trustee** at the **Ulster Society for Prevention of Cruelty to Animals (USPCA)**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Baroness Gray is a former special adviser at Special Advisor Pay Band 4. Her last day of service was 6 October 2024.

The purpose of the Rules is to protect the integrity of the government. They aim to avoid any reasonable concerns that: a civil servant may be influenced in their official duties by the risk of reward; a civil servant may improperly exploit access to information; and an organisation may gain an improper influence through the employment of a civil servant.

The Commission's advice is that the appointment should be made subject to the following conditions:

1. Privileged information – Baroness Gray should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information² available to her from her time in the civil service.
2. Lobbying – For two years from her last day in office, until 6 October 2026, Baroness Gray should not become personally involved in lobbying³ the UK government or its arm's length bodies on behalf of USPCA (including parent companies, subsidiaries, partners and clients). They should not make use, directly or indirectly, of her contacts in the government and/or civil service to

¹ See the [Business appointment rules for Crown servants](#).

² Meaning official information to which a civil servant has had access as a consequence of his or her office or employment and which has not been made publicly available.

³ As defined in the rules.

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First Civil Service Commissioner
Civil Service Commission**

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influence policy, secure business/funding or otherwise unfairly advantage USPCA (including parent companies, subsidiaries, partners and clients).

3. Bids and contracts – For two years from her last day in office, until 6 October 2026, Baroness Gray should not provide advice to USPCA on a bid or contract relating to the UK government or its arm's length bodies.

The Rules set out that special advisers must abide by the Commission's advice. It is Baroness Gray's personal responsibility to manage the propriety of any appointment and to understand any other rules and regulations they may be subject to in parallel with the Commission's advice.

Baroness Gray must seek advice if she proposes to extend or otherwise change her role with the organisation. Once this appointment has been publicly announced or taken up, Baroness Gray is obliged under the Rules to inform the Commission who will publish this letter on its website.

Yours sincerely,

A handwritten signature in black ink that reads "Gisela Stuart".

Gisela Stuart
First Civil Service Commissioner

Annex A: The application

Applicant assessment

1. According to its website, the Ulster Society for Prevention of Cruelty to Animals (USPCA) is an animal welfare charity.
2. Baroness Gray said she would join as a Trustee, where she will:
 - focus on making sure the charity runs effectively;
 - be on the board that provides overall direction, manages funding, and ensures compliance with the law; and
 - support the leadership of the charity, help set the strategy, and oversee the operational team.
3. Baroness Gray stated that her role will not involve contact with, or lobbying of, government.
4. Baroness Gray was the Chief of Staff at the Prime Minister's Office from July 2024 to October 2024. Here she had oversight of the Prime Minister's Office's political staff and the work of special advisers across government. She also advised on a range of issues including government policy, party politics and communication strategies.
5. Baroness Gray stated she has not been responsible for regulatory, funding or any other decisions affecting USPCA at any time in her last two years in the civil service.

CSC analysis

6. *Application Level.* As a Level 1 application for an unpaid role, the Commission's analysis applies the principle that this category of appointment is generally recognised as posing a lower risk to government integrity.
7. *Risk of reward.* Baroness Gray was not involved in policy, regulatory, or contractual decisions affecting USPCA during her time in post. The role is unpaid, meaning the risk that the offer was made as a reward for decisions made during her time in government is low.
8. *Access to information.* As Chief of Staff, Baroness Gray would have had access to a range of policy information. Her last day in civil service was 6

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October 2024. She will likely retain some privileged knowledge about government decision-making and contacts with civil servants who are still in post. This risk is general and not specific to her proposed role with USPCA, and will be mitigated by the standard condition.

9. *Improper influence.* As Chief of Staff, Baroness Gray would have a network of contacts in government that could provide an unfair advantage to USPCA. She has stated there will be no contact with government in her proposed role. The risk of the perception of lobbying the government in order to influence policy changes is mitigated by the standard conditions.