

Cabinet Office

10 November 2025

Paid appointment with the Gerson Lehrman Group: Application under the Business Appointment Rules from Mr James Lyons, former Director of Strategic Communications 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 **James Lyons**, formerly Director of Strategic Communications at the Prime Minister's Office. The application is for a paid role as a Speaker and Adviser with the **Gerson Lehrman Group**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Mr Lyons is a former special adviser at Special Adviser Pay Band 4. His last day of service was 1 September 2025.

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. Mr Lyons should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information² available to him from his time in office.
2. For two years from his last day in office, until 1 September 2027, Mr Lyons should not become personally involved in lobbying³ the UK government or its arm's length bodies on behalf of the Gerson Lehrman Group. He should also not make use, directly or indirectly, of his contacts in the government and/or civil service to influence policy, secure business/funding or otherwise unfairly advantage the Gerson Lehrman Group. These restrictions apply to parent companies, subsidiaries, partners and clients.

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.

**Baroness Stuart of Edgbaston
First Civil Service Commissioner
Civil Service Commission**

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3. For two years from his last day in office, until 1 September 2027, Mr Lyons should not provide advice to the Gerson Lehrman Group, 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 or its arm's length bodies.
4. For two years from his last day in office, until 1 September 2027, Mr Lyons is prevented from advising GLG or its clients on work regarding any policy or operational matter he had a material role in developing or determining, or where he had a material relationship with the company or organisation, in his former role.

The Rules set out that special advisers must abide by the Commission's advice. It is Mr Lyons' 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.

Mr Lyons must seek advice if he proposes to extend or otherwise change his role with the organisation. Once this appointment has been publicly announced or taken up, Mr Lyons 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, reading "Gisela Stuart".

Gisela Stuart
First Civil Service Commissioner

Annex A: The application

Applicant assessment

1. According to its website, Gerson Lehrman Group (GLG) is a large financial and global information services consulting company.
2. As Speaker and Adviser at GLG, Mr Lyon's responsibilities will involve speaking at GLG events and giving strategic advice to GLG clients. He said that advice and insight offered would be based on his experience predominantly acquired before entering government.
3. Mr Lyons confirmed his role will not involve contact with government. He stated he had no official dealings with GLG, nor any involvement in policy development or decisions specific to the organisation, during his time in office.

Departmental assessment

4. As Director of Strategic Communications at the Prime Minister's Office, Mr Lyons was exposed to some privileged information about the government's legislative and policy programme, though the Cabinet Office confirmed that Mr Lyons's insight into major announcements was unlikely, as communications discussions had not begun when he left.
5. The department noted the two month gap between Mr Lyons leaving government and starting this role would likely diminish the currency of any information still retained. The Cabinet Office also said GLG operates a policy requiring members and clients to not divulge, reveal, or request any non-public information or confidential material from their previous employment.
6. The Cabinet Office confirmed that Mr Lyons was not involved in any regulatory, policy or commercial decisions specific to GLG.
7. The Cabinet Office recommended standard conditions.

CSC analysis

8. *Risk of reward.* Mr Lyons had no official dealings with GLG and was not involved in policy, regulatory, or contractual decisions affecting the organisation during his time in post. The risk of the appointment being a reward for decisions made in office is therefore low.

9. *Access to information.* As a Special Advisor at the centre of government, Mr Lyons would have been exposed to some privileged information about the government's legislative and policy programme. However, the Cabinet Office confirmed he was not aware of anything detailed about unannounced plans. Further, GLG policy requires members and clients not to request or divulge non-public information. The standard privileged information ban mitigates any remaining risks around his access.
10. *Improper influence.* There is a risk that Mr Lyons' appointment could offer an unfair influence to GLG and its clients. As a former Special Advisor, he would have had significant political contacts and knowledge of the inner workings of government, which clients could seek to leverage. This perception that he could secure an unfair advantage, influence government policy, or improve success in government bids and contracts, is mitigated by the standard lobbying condition. Mr Lyons stated he would not have contact with government in the role.
11. *Unknown clients.* The Commission considered that there are risks associated with the unknown, ad-hoc nature of GLG's clients. The Commission recognised that his role in government was communications-focused, which limits his material involvement in policy and operational decisions and risks involved. A condition is applied to mitigate any remaining risk, preventing him from advising GLG or its clients on work regarding any policy or operational matter he had a material role in developing or determining, or where he had a material relationship with the company or organisation, during his time in government.