

Cabinet Office

11 December 2025

**Paid appointment with the Advertising Standards Agency: Application under the Business Appointment Rules from Ms Sarah Munby, former Permanent Secretary at the Department for Science, Innovation and Technology.**

Thank you for submitting an application for advice under the Business Appointment Rules (the Rules) to the Civil Service Commission (the Commission) on behalf of **Ms Sarah Munby**, formerly Permanent Secretary at the Department for Science, Innovation and Technology. The application is for a part time, paid role as the Independent Reviewer of the Advertising Standards Agency (ASA) decisions. Further detail on the content of the application is in the Annex. The Commission's advice is required as Ms Munby is a former civil servant at SCS Pay Band 4. Her last day of service was 5 July 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<sup>1</sup> is that this application should be subject to the following conditions:

1. Privileged information – Ms Munby should not draw on (disclose or use for the benefit of herself the persons or organisations to which this advice refers) any privileged information available to her from her time in office.
2. Lobbying – For two years from her last day in office, until 5 July 2027, Ms Munby should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of the ASA (including parent companies, subsidiaries, partners and clients). She should also not make use, directly or indirectly, of her contacts in the government and/or civil service to influence policy, secure business/funding or otherwise unfairly advantage the ASA

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<sup>1</sup> See [Advice under the Business Appointment Rules](#) for details applying to all advice issued by the Civil Service Commission.

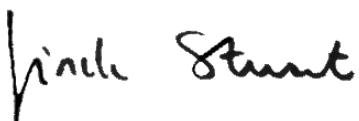
(including parent companies, subsidiaries, partners and clients).

3. Bids and contracts – For two years from her last day in the civil service, until 5 July 2027, Ms Munby should not provide advice to the ASA on a bid or contract relating to the UK government or its arm's length bodies.

The Rules set out that civil servants must abide by the Commission's advice. It is Ms Munby'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.

Ms Munby 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, the letter will be published on the Civil Service Commission's website.

Yours sincerely,

A handwritten signature in black ink that reads "Gisela Stuart". The signature is fluid and cursive, with "Gisela" on the first line and "Stuart" on the second line.

**Gisela Stuart**  
First Civil Service Commissioner

## **Annex A: The application**

### Applicant assessment

1. The Advertising Standards Authority (ASA) is the UK's independent, self-regulatory body for the advertising industry. It is a non-statutory, private limited company whose primary role is to regulate the content of advertisements, sales promotions, and direct marketing in the UK. The ASA ensures compliance with the UK Advertising Codes, primarily by investigating public complaints and ruling on whether advertising complies with these standards.
2. The ASA is independent and receives no direct government funding. It is governed by an independent Board of Directors. Its operations are funded by a voluntary levy collected on advertising costs by the Advertising Standards Board of Finance (ASBOF). It is, however, recognised by the government and other regulators as the body to handle advertising complaints and has a Memorandum of Understanding with the Department for Culture, Media and Sport (DCMS) regarding its role in broadcast advertising.
3. Ms Munby stated this is a role undertaking assessments of individual cases. The decisions and reasoning are open, meaning they are publicly accessible and transparent for public scrutiny. There is also no opportunity to influence which cases come under consideration or to make final decisions. She added that the Reviewer is not contracted by the ASA and is constitutionally independent from them.
4. The position is recruited and overseen by the ASBOF and is separate from the ASA Executive and Council. The Reviewer's process involves responding to referred cases by reviewing written material from both sides and deciding whether to send the case back to the Council. The Reviewer does not make initial decisions, select cases for referral, make the final determination (which is reserved for the Council), or set codes or regulations. All decisions and reasoning from the Reviewer are a matter of public record and are subject to Judicial review, ensuring accountability. Her role will not involve contact with government.
5. Ms Munby stated the appointment took place following an advertised, competitive search and a panel interview.
6. As Permanent Secretary of the Department for Science, Innovation and Technology (DSIT), Ms Munby held overall responsibility for the department from its inception in 2023<sup>2</sup>. This included setting the department's strategy, overseeing operations, and leading the delivery of key priorities in the UK's

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<sup>2</sup> Following the Machinery of Government changes in February 2023, Ms. Munby's position as Permanent Secretary at the Department for Business, Energy and Industrial Strategy (BEIS) transitioned into the role of Permanent Secretary at DSIT.

science, innovation and technology ecosystem. Ms Munby acknowledged that broader regulatory work within her former departments (DSIT/Department Business, Energy and Industrial Strategy) was wide-ranging and could affect all business sectors, including indirectly towards the Advertising Standards Agency (ASA). However, she emphasised that she was never part of any discussion regarding how her responsibilities in office would specifically affect the ASA or advertising more generally. She characterised any such impacts as 'one among many,' as broader business regulation naturally affects all sectors of the economy.

7. Ms Munby stated she did not meet with the ASA, nor was she involved in policy, regulatory or commercial decisions directly related to advertising during her time in post. She added that policy sponsorship for the advertising industry falls under DCMS, not her former department. In her capacity leading the department responsible for the technology sector, she acknowledged that she met with companies that provide digital media platforms but did not discuss advertising matters with them in any way.

#### Departmental assessment

8. While some policies from her former departments indirectly related to the sector, in which the ASA operates, the Cabinet Office and DSIT confirmed that she made no decisions specific to the organisation or the sector during her time in post. The Cabinet Office noted that as the ASA receives no government funding and the remit for advertising policy is outside of Ms Munby's former department, it is unlikely she would have been able to influence decisions in the ASA's favour during her time in post.
9. The Cabinet Office added that while she retains a wide range of privileged information from her time as a former Permanent Secretary, it is unlikely this would offer an unfair advantage to the ASA and did not specify any information that presents a risk.
10. The Cabinet Office stated that Ms Munby's appointment was offered following a public advertisement and a competitive interview process. This significantly diminishes the risk that the appointment is perceived to be a reward for decisions made in post. DCMS was also consulted and noted no direct overlap with her previous role, stating it is content with the proposed appointment and identified no concerns with the proposed role.
11. The departments recommended the standard conditions.

#### CSC's analysis

12. *Risk of reward.* Ms Munby did not have contact with the ASA, nor was she involved in any decisions specific to the organisation, commercial or otherwise. The risk of reward for decisions or actions taken in office is limited.
13. *Access to information.* It is likely that Ms Munby had access to a wide range of information that may benefit many organisations, though the departments did not note anything specific. The risk relating to her access to information is not specific to the work of the ASA, given the organisation's operation mostly overlaps with the work of DCMS, a department she was not employed by. Further, it has been over five months since she left the civil service, which will have reduced the currency of any information she may possess. The standard conditions would appropriately mitigate the risks. The privileged information ban prevents Ms Munby from making use of privileged insight gained from her time in the civil service.
14. *Improper influence.* As a former Permanent Secretary, Ms Munby would retain contacts in government. It is significant that her proposed role does not involve contact with the UK government. The lobbying ban appropriately mitigates the risk of influence.
15. *Waiting period.* As an SCS Pay Band 4 official, Ms Munby is subject to a three month waiting period upon leaving government service in taking up any appointments. This is not applicable as it has been five months since she left the civil service.