

Cabinet Office

20 February 2026

Paid appointment with Phoenix Court Group Limited: Application under the Business Appointment Rules from Ninjeri Pandit, former Director General Delivery at the Prime Minister's Office.

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 Ninjeri Pandit**, formerly Director General Delivery at the Prime Minister's Office. The application is for a paid, full-time role as **Chief Operating Officer, Special Projects Unit with Phoenix Court Group Limited (Phoenix Court)**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Ms Pandit is a former civil servant at SCS Pay Band 3. Ms Pandit's last day in post and at the Prime Minister's Office was 12 November 2025. Her last day of civil service employment will be 22 February 2026.

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 advice¹ is that the appointment with Phoenix Court should be made subject to the following conditions:

1. Privileged information – Ms Pandit should not draw on (disclose or use for the benefit of herself or 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 22 February 2028, Ms Pandit should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of Phoenix Court (including parent companies, subsidiaries, partners and clients). She should also not use, directly or indirectly, her contacts in the government and/or civil service to influence policy, secure business/funding or otherwise unfairly advantage Phoenix Court (including parent companies, subsidiaries, partners and clients).
3. Bids and contracts – For two years from her last day in the civil service, until 22

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

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

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February 2028, Ms Pandit should not provide advice to Phoenix Court (including parent companies, subsidiaries, partners and clients) on a bid or contract relating to the UK government or its arm's length bodies.

4. Engagement with government – For two years from her last day in the civil service, until 22 February 2028, Ms Pandit should not initiate engagement on behalf of Phoenix Court (including parent companies, subsidiaries, partners and clients) with the UK government or its arm's length bodies.
5. Limitation to the role – For two years from her last day in civil service, until 22 February 2028, Ms Pandit is prevented from advising Phoenix Court or its clients on work regarding any policy or operational matter that she had a material role in developing or determining, or where she had a material relationship with Phoenix Court's clients, during her time as Director General, Delivery at the Prime Minister's Office.

Ms Pandit and Phoenix Court confirmed to the Commission her intention to fully comply with the lobbying ban that applied to her. Phoenix Court also confirmed its understanding of, and adherence to the remaining conditions that apply to Ms Pandit's role.

The Rules set out that civil servants must abide by the Commission's advice. It is Ms Pandit's personal responsibility to manage the propriety of any appointment and to understand any other rules and regulations she may be subject to in parallel with the Commission's advice.

Ms Pandit 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".

Gisela Stuart
First Civil Service Commissioner

Annex A: The application

Applicant assessment

1. According to its website, Phoenix Court Group Limited (Phoenix Court) is a London-based venture capital firm.
2. As Chief Operating Officer of the newly established Special Projects Unit, Ms Pandit will lead a multi-disciplinary team overseeing fund operations, compliance, and strategic execution. Her role involves helping life science and deep technology companies grow by bringing together funding and policy, and expanding their business knowledge in Asia and Europe. In addition, she plans to build digital and physical infrastructure to boost innovation in disadvantaged communities and support UK founders.
3. Ms Pandit stated Phoenix Court was represented at business forums led by the Prime Minister's Office, and the company was part of a UK delegation to India. She added that Phoenix Court regularly engages with government departments, including the Cabinet Office and the Prime Minister's Office, to identify policy support opportunities for companies that the company invests in. Its co-founder and Managing Partner, Saul Klein OBE, is a member of the Prime Minister's Council for Science and Technology and was appointed as a Non-Executive Director at the Department for Science, Innovation and Technology (DSIT) in April 2023².
4. Ms Pandit stated that the Special Projects team will work across government departments, including the Cabinet Office and the Prime Minister's Office via the Regulatory Innovation Office (RIO)³, to identify how the UK Government can support companies to scale up. Ms Pandit stated she will abide by the Commission's advice and as part of her role, she will not engage in communication with government with a view to influencing a government decision or policy whilst she is subject to the Rules.
5. As Director General Delivery, Ms Pandit oversaw and drove the strategic delivery of the Prime Minister's top Plan for Change⁴ priorities, including housing, NHS, and immigration. This involved administering high-level

² GOV.UK, 'Saul Klein OBE' <https://www.gov.uk/government/people/saul-klein#:~:text=Saul%20Klein%20was%20appointed%20as,and%20Basecamp%20venture%20capital%20funds>.

³ Regulatory Innovation Office, 'What we do' <https://www.gov.uk/government/organisations/regulatory-innovation-office/about>

⁴ Prime Minister's Office, 'Plan for Change', <https://www.gov.uk/missions>

stocktakes for the Prime Minister and Chief of Staff, and engaging directly with relevant government departments, ministers, and senior officials to formally review and accelerate delivery progress. Prior to this, she was Principal Private Secretary (PPS) to the Prime Minister until August 2025, with responsibility for the effective running of the Prime Minister's Private Office, including oversight of advice provision, diary and liaison with the Royal Household.

6. Ms Pandit stated she has not been responsible for any policy, regulatory or commercial decisions specific to Phoenix Court during her time as Director General Delivery. She added that she did not have official contact with the company during her time in post, but had one personal engagement in 2024.

Correspondence with Phoenix Court

7. Phoenix Court confirmed its understanding of, and adherence to the Commission's advice and the conditions imposed on Ms Pandit's appointment. The company confirmed her role will not constitute lobbying nor involvement in initiating engagement with government.

Departmental assessment

8. The Cabinet Office stated that Ms Pandit was not involved in decisions specific to Phoenix Court, commercial or otherwise. The department's assessment that the risk of this appointment is perceived as a reward for decisions in post is limited.
9. The Cabinet Office confirmed that Phoenix Court already has a formal relationship with the government, as Ms Pandit mentioned. The department also noted that, as a result of its investment portfolio, Phoenix Court may also have further indirect links to government.
10. The Cabinet Office has stated that as Director General Delivery, Ms Pandit held an influential role in advising the Prime Minister on policy, granting her access to sensitive information regarding science, technology, health, and public spending. The department confirmed she does not possess specific commercial information that would present a risk under the Rules. Further, Cabinet Office confirmed that Ms Pandit has not worked in the Prime Minister's Office since 12 November 2025, reducing the currency of information she may hold. However, it added that in her role, she would have been privy to information on the government's policy direction and priorities. It could also

reasonably be assumed to hold knowledge of its long-term strategic thinking on key policy areas, which could confer an unfair advantage to Phoenix Court Group in its investment decisions. To mitigate the risks associated with her access to information, they recommended that Ms Pandit's role be subject to the privileged information ban and that Ms Pandit should also recuse herself from client relationships where she has access to privileged information which could prove relevant to those clients.

11. The Cabinet Office noted Ms Pandit's relationships in the centre of government and the risk that this could provide an unfair advantage to Phoenix Court. To mitigate the risks relating to improper influence, the department recommended the remaining standard conditions and that Ms Pandit should not engage in communication with government with a view to influencing government decisions or policy development, in relation to her own interests or the interests of Phoenix Court.

CSC analysis

12. *Risk of reward.* The Commission agreed with the department's assessment that the risk of this appointment being perceived as a reward for decisions in post is limited.
13. *Access to information.* In her most recent role as Director General Delivery, Ms Pandit had access to high-level strategic thinking and policy priorities, including overseeing the Prime Minister's 'Plan for Change'. While the Cabinet Office confirmed she did not possess specific commercial data, her sustained seniority at the heart of government would have provided consistent access to high-level policy direction. However, Ms Pandit has not worked in the Prime Minister's Office since November 2025, reducing the currency of residual information she may hold from this role. Ms Pandit's previous role as PPS to the Prime Minister would have exposed her to sensitive information across the breadth of government policy, though the nature of this role means the currency of information degrades particularly rapidly. The Commission therefore agreed with the department that these risks are appropriately mitigated by the standard privileged information ban, alongside a specific requirement to recuse herself from client relationships where she possesses relevant privileged information.
14. *Limitation to the role.* Phoenix Court is a venture capital firm with unknown clients. Although the risks relating to Ms Pandit's access to information are general, they would become more acute should she advise the company or its

clients on matters that overlapped with her official responsibilities. To mitigate this risk, a specific limitation has been applied relating to Ms Pandit's role as Director General Delivery, preventing her from advising Phoenix Court or its portfolio companies on any matter in which she had a material role, or advising on matters where she had a material relationship with the relevant clients or portfolio companies of Phoenix Court.

15. *Improper influence and engagement with government*: The Commission noted that, as a former senior official with high-level government contacts, Ms Pandit could provide an unfair advantage to Phoenix Court. As her role in the Special Projects Unit involves identifying government support for growing companies, there is a risk that this contact with government could be seen as the company deliberately trying to increase its influence through Ms Pandit's personal network and former seniority. To mitigate these concerns, the Commission has applied an additional condition preventing Ms Pandit from initiating any engagement with the government on behalf of Phoenix Court. These restrictions do not preclude her from responding to government-led requests. Both Ms Pandit and Phoenix Court have confirmed that she will not engage in lobbying, with the initiation of government engagement to be handled by other members of the organisation.