

Cabinet Office

17 February 2026

**Paid appointment with UKAI Trade Organisation Limited: Application under the Business Appointment Rules from Michael Potter, former Government Chief Digital Officer at the Central Digital and Data Office, the Cabinet Office and 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 **Michael Potter**, formerly Government Chief Digital Officer at the Central Digital and Data Office, the Cabinet Office and the Department for Science, Innovation and Technology (DSIT). The application is for a paid, part-time role as an **Advisory Board Member** with **UKAI Trade Organisation Limited (UKAI)**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Mr Potter is a former civil servant at SCS Pay Band 3. His last day of service was 5 November 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<sup>1</sup> is that the appointment with UKAI should be made subject to the following conditions:

1. Privileged information – Mr Potter 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 office.
2. Lobbying – For two years from his last day in office, until 5 November 2026, Mr Potter should not become personally involved in lobbying the UK Government or its arm's length bodies on behalf of UKAI (including parent companies, subsidiaries, partners and clients). He should also not use, directly or indirectly, his contacts in the government and/or civil service to influence policy, secure business/funding or otherwise unfairly advantage UKAI (including parent

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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.

companies, subsidiaries, partners and clients).

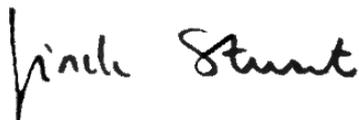
3. Bids and contracts – For two years from his last day in the civil service, until 5 November 2026, Mr Potter should not provide advice to UKAI (including parent companies, subsidiaries, partners and clients) on a bid or contract relating to the UK Government or its arm's length bodies.
4. Engagement with government – For two years from his last day in the civil service, until 5 November 2026, Mr Potter should not initiate engagement on behalf of UKAI (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 his last day in the civil service, until 5 November 2026, Mr Potter is prevented from advising UKAI or its partners/clients on work regarding any policy or operational matter that he had a material role in developing or determining, or where he had a material relationship with the relevant partner/client, during his time as Government Chief Digital Officer at the Cabinet Office and DSIT.

Mr Potter and UKAI confirmed to the Commission of his intention to fully comply with the lobbying ban that applied to him. UKAI also confirmed its understanding of, and adherence to the remaining conditions that apply to Mr Potter's role.

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

Mr Potter 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, the letter will be published on the Civil Service Commission's website.

Yours sincerely,



**Gisela Stuart**  
First Civil Service Commissioner

## **Annex A: The application**

### Applicant assessment

1. According to its website, UKAI Trade Association Limited (UKAI) is an industry association for companies involved in the Artificial Intelligence (AI) sector, encompassing both startups and established enterprises. UKAI provides advice and analysis to the UK Government and public sector stakeholders on UK AI policy that supports business operations and technological development.
2. As Advisory Board Member, Mr Potter stated he will provide strategic guidance and high-level expertise to help shape the organisation's priorities, policy positions and overall direction.
3. Mr Potter stated that he will not be involved in lobbying or bids and contracts, nor have contact with government; use privileged information acquired in office; or engage in any work that overlaps with specific policy areas or programmes he directly worked on within his last two years of government service.
4. As Government Chief Digital Officer, Mr Potter was responsible for leading the digital, data, and technology profession across the Civil Service. His role included setting the overall strategy and defining government-wide standards to ensure public services were consistent, secure, and modern.
5. Prior to his most recent role in the civil service, Mr Potter held senior roles across both the public and private sector over the last 20 years in digital, data and related services.
6. Mr Potter stated he was not responsible for any policy, regulatory or commercial decisions specific to UKAI as an organisation during his time as Government Chief Digital Officer.

### Correspondence with UKAI

7. UKAI confirmed its understanding of, and adherence to the Commission's advice and the conditions imposed on Mr Potter appointment. The company confirmed his role will not involve lobbying nor involvement in initiating engagement with government.

### Departmental assessment

8. The Cabinet Office stated that Mr Potter did not meet with UKAI, nor was he involved in decisions specific to the organisation, commercial or otherwise,

during his time in post. The Cabinet Office considers the risk of the appointment being seen as a reward for decisions made in post to be limited.

9. The Cabinet Office stated that it does not hold any contractual or commercial relationship with UKAI.
10. The Cabinet Office stated that Mr Potter did not have access to information that UKAI might find valuable or that is sensitive.
11. In line with the description of his role, the Cabinet Office recommended that in addition to the standard conditions, Mr Potter should be required to recuse himself from any work that overlaps with specific policy areas or programmes he directly worked on during his last two years in government service.

### CSC analysis

12. *Risk of reward.* The Commission agreed with the department's assessment and considered the risk this appointment can be perceived as a reward for decisions in post to be limited.
13. *Access to information.* There is some overlap between this appointment and Mr Potter's former role as Chief Digital Officer, in which he oversaw digital and data strategy across government. It is likely that Mr Potter had access to a wide range of information that may benefit many organisations, including UKAI which operates in the AI and technology sector. However, the Commission considers the risks relating to his access to information to be limited as it has been over 14 months since he left his civil service role, reducing the currency of any information he had access to. The Cabinet Office is also unaware of any sensitive information he may possess that presents a risk.
14. *Limitation to the role.* Although the risk relating to Mr Potter's access to information is general, the risk becomes more acute should he advise the company on matters that overlapped with his official responsibilities. To mitigate this risk, in addition to the standard privileged information ban, the Commission agreed with the Cabinet Office's recommendation that Mr Potter be prevented from advising UKAI or its partners/clients on work regarding any policy or operational matter that he had a material role in developing or determining, or where he had a material relationship with the relevant partner/client.
15. *Improper influence and engagement with government.* As a senior official, Mr Potter will have a network of contacts in government that could provide an unfair advantage to UKAI. It would be improper for the former Government Chief Digital Officer to be involved in helping UKAI establish relationships with government or advising on work/bids related to government. Mr Potter stated

that his role will not involve contact with, or lobbying of, government. Mr Potter and UKAI confirmed to the Commission his intention to fully comply with the lobbying ban that applies to him. The standard lobbying ban will go some way to mitigate this. Given that UKAI provides advice and analysis to the UK Government, and considering Mr Potter's former seniority in the Civil Service, the Commission advises that a ban on him initiating engagement with government on UKAI's behalf while he is subject to the Rules will further mitigate the influencing risk.