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Civil Service Commission

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Cabinet Office

24 April 2026

**Paid application with Arqiva: 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**, former Permanent Secretary at the Department for Science, Innovation and Technology. The application is for a paid, part-time role as **Non-Executive Director with Arqiva**. 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. Ms Munby's last day in the civil service was 30 June 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 the appointment with Arqiva should be made subject to the following conditions:

1. Privileged information – Ms Munby 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 30 June 2027, Ms Munby should not become personally involved in lobbying the UK Government or its arm's length bodies on behalf of Arqiva (including parent companies, subsidiaries, partners and clients). She should also not use, directly or indirectly, her contacts in government and/or civil service to influence policy, secure business/funding or otherwise unfairly advantage Arqiva (including parent companies, subsidiaries, partners and clients).

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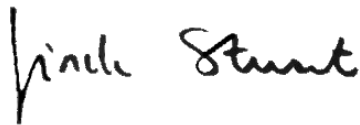
<sup>1</sup> See [Advice under the Business Appointment Rules](#) for details applying to all advice issued by the Civil Service Commission.

3. Bids and contracts – For two years from her last day in the civil service, until 30 June 2027, Ms Munby should not provide advice to Arqiva 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 30 June 2027, Ms Munby should not have any engagement on behalf of Arqiva (including parent companies, subsidiaries, partners and clients) with 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 she 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. 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 written in a cursive, flowing style.

**Gisela Stuart**  
First Civil Service Commissioner

## Annex A: The application

1. According to Ofcom, Arqiva is a privately owned UK company that operates broadcast infrastructure, including the nationwide network for digital terrestrial TV and radio<sup>2</sup>. Its business also includes managing contracts for smart meter connectivity through the Data Communications Company (DCC)<sup>3</sup>.
2. As an infrastructure provider, Arqiva has significant interest in pending government decisions, particularly those made by the Department for Culture, Media and Sport (DCMS) and the Department for Science, Innovation and Technology (DSIT). The company is actively campaigning to extend the Digital Terrestrial Television platform past the current 2034 deadline to at least 2044. In the past, Arqiva has been awarded contracts with and responded to information requests from the UK Government.
3. Ms Munby's appointment to the Board of Arqiva is formally appointed by Polus Capital Management Group, a London and New York-based alternative credit manager with a stake in Arqiva.

### Applicant assessment

4. As a Non-Executive Director, Ms Munby stated her role on Arqiva's board will involve providing strategic direction, ensuring financial oversight, and upholding governance standards.
5. She confirmed that her role will not involve contact with, or lobbying of, the government, nor will it entail involvement in any government contracts. She stated that she is aware of the standard conditions that apply to her interactions with Arqiva. However she said that, as government policy directly affects Arqiva's strategy, she expects to be involved in high-level Board discussions regarding relevant strategic issues.
6. As Permanent Secretary at DSIT from its inception in 2023, Ms Munby held overall responsibility for the department. This included setting DSIT's strategy, overseeing operations, and leading the delivery of key priorities in the UK's science, innovation and technology ecosystem. She also served as Principal Accounting Officer, reporting to Parliament on the department's performance

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<sup>2</sup> 'About Arqiva', Ofcom, <https://www.ofcom.org.uk/siteassets/resources/documents/consultations/uncategorised/8254-uk-comms-infrastructure/responses/arqiva.pdf?v=64772>

<sup>3</sup> DCC is a central infrastructure provider in the UK that manages the secure nationwide network connecting smart meters in homes and businesses to energy suppliers and network operators.

and providing the formal sponsorship and financial oversight for its arm's length bodies, including Ofcom.

7. Ms Munby stated she did not have dealings with Arqiva or Polus Capital while in post. She also confirmed she had no involvement in policy regarding the future of digital terrestrial television or the media and broadcast sectors, noting that these fall under DCMS's purview. Ms Munby acknowledged previous involvement in the smart meter rollout during her time as Permanent Secretary at the Department for Business, Energy and Industrial Strategy (BEIS). However, she noted that it has been over three years since she had involvement in matters of relevance. Ms. Munby said that Arqiva's specialised infrastructure for broadcasting and smart meters is not directly comparable to the major communications companies she engaged with while at DSIT.
8. Ms Munby was identified for the Non-Executive Director role at Arqiva through Russell Reynolds, a search firm.

#### Departmental assessment

9. DSIT, DCMS and the Cabinet Office were consulted on Ms Munby's application. The departments confirmed that Ms Munby had no previous official dealings with Arqiva during her time in post.
10. DSIT stated that a consortium including Arqiva previously lobbied government departments for a commercially-owned model for the UK National Enhanced Long-Range Navigation (eLoran) system, contrary to the government's preference for a UK Government-owned but commercially operated system. In December 2024, Arqiva's partner, Hellen Systems, requested a meeting to discuss an eLoran proposal. The request was declined following policy advice and was not escalated to Ms Munby. As the UK Government ultimately rejected the model Arqiva had lobbied for, DSIT and DCMS confirmed there is no risk of the appointment being perceived as a reward for past decisions.
11. DSIT and DCMS did not consider Ms Munby to possess information specific to Arqiva that could be considered commercially valuable or sensitive. DSIT stated Ms. Munby was not involved in eLoran or TV distribution matters and that she was not sighted on any advice to ministers on the matter. Further, the departments added that as it has been over eight months since Ms Munby left government, they consider it likely that the currency of any information she may retain from her time in post is limited.
12. The departments identified the primary risk as the potential for Ms Munby's former seniority as a Permanent Secretary to afford Arqiva undue influence. They stated that the risk is heightened as Arqiva has a history of lobbying the

government on its decisions, retains the services of consultant lobbyists, and relies on significant, pending government decisions for its business. These decisions include upcoming policy determinations, such as the policy on whether to continue digital television and FM radio broadcasts beyond the mid-2030s. They also involve key periodic or strategic funding reviews, including the funding for smart meters, which Arqiva is involved in delivering for water companies, as influenced by Ofwat's Green economic recovery plan<sup>4</sup>; and the TV License Fee, a portion of which the British Broadcasting Corporation uses to fund Digital Terrestrial Television networks

13. DCMS and DSIT recommended the standard conditions apply to Ms Munby's appointment. The Cabinet Office recommended restricting Ms Munby from any government engagement on Arqiva's behalf, mitigating the risk of undue influence given her former seniority and Arqiva's lobbying activities.

### The Commission's analysis

14. *Risk of reward.* Ms. Munby had no direct contact with Arqiva and was not involved in specific decisions concerning the company while Permanent Secretary. This separation is evidenced by the government's decision to implement an alternative eLoran operating model to that which the company advocated for. Furthermore, records show that meeting invitations from Arqiva's partners were formally declined by Ms. Munby's Private Office without her personal involvement or awareness. Consequently, the risk that this appointment represents a reward for past actions is considered low.
15. *Access to information.* As a former Permanent Secretary, Ms Munby had access to high-level, strategic information. Her administrative and financial oversight as Principal Accounting Officer of DSIT meant she may have been privy to high-level policy insights of Ofcom. However, this access is unlikely to provide an unfair advantage as Ofcom is an independent regulator, with its decisions concerning Arqiva based on statutory duties and transparent market reviews. The media regulation aspect of Ofcom sits with DCMS, and her former department did not evidence any particular information or determinations that may present a risk. Further, over eight months have passed since she left the civil service and her most recent role at DSIT did not include oversight of matters relating to digital terrestrial television or the media and broadcast sectors, which fell to DCMS. The Commission therefore considered that the currency of any sensitive information she may have held will have significantly reduced, and that any remaining risk is appropriately managed by the standard conditions.

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<sup>4</sup> Ofwat, 'Green Economic Recovery 2021'  
<https://www.ofwat.gov.uk/wp-content/uploads/2021/05/Green-economic-recovery-draft-decisions.pdf>

16. *Improper influence and engagement with government.* As a former Permanent Secretary, Ms Munby will have a network of contacts in government that could provide an unfair advantage to Arqiva. It would be improper for Ms Munby to help Arqiva establish relationships with government or advise on work related to government. This is prevented by the standard conditions.
17. Ms Munby stated that her role will not involve contact with, or lobbying of, government. Ms Munby and Arqiva also confirmed to the Commission her intention to fully comply with the lobbying ban that applies to her. Given Arqiva's lobbying of government, its reliance on government decisions, and the seniority of Ms. Munby's former role, the Commission agrees with the Cabinet Office's recommendation that an explicit ban on engagement with government on Arqiva's behalf will further credibly mitigate the influencing risk.
18. *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 eight months since she left the civil service.