

Cabinet Office

29 May 2026

Unpaid appointment with the Ulster Society for Prevention of Cruelty to Animals (USPCA): Application under the Business Appointment Rules from Baroness Sue Gray CBE, former Chief of Staff at the Prime Minister's Office.

The Civil Service Commission (the Commission) has considered an application for advice under the Business Appointment Rules (the Rules) from **Baroness Sue Gray CBE**, formerly Chief of Staff at the Prime Minister's Office. The application is for an unpaid role as **Chair** at the **Ulster Society for Prevention of Cruelty to Animals (USPCA)**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Baroness Gray is a former special adviser at Special Adviser Pay Band 4. Her last day of service was 6 October 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 advice¹ is that the appointment with the USPCA should be made subject to the following conditions:

1. Privileged information – Baroness Gray 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 the civil service.
2. Lobbying – For two years from her last day in the civil service, until 6 October 2026, Baroness Gray should not become personally involved in lobbying the UK Government or its arm's length bodies on behalf of the USPCA (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 the USPCA (including parent companies, subsidiaries, partners and clients).
3. Bids and contracts – For two years from her last day in the civil service, until 6 October 2026, Baroness Gray should not provide advice to the USPCA on a

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

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 Baroness Gray'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.

Baroness Gray 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 "S. K. Owen." The signature is written in a cursive, slightly informal style.

Kate Owen
Chief Executive

Annex A: The application

Applicant assessment

1. According to its website, the Ulster Society for Prevention of Cruelty to Animals (USPCA) is an animal welfare charity.
2. Baroness Gray wishes to take up the role of Chair. This role will:
 - focus on making sure the charity runs effectively;
 - be on the board that provides overall direction, manages funding, and ensures compliance with the law;
 - support the leadership of the charity, help set the strategy, and oversee the operational team; and
 - chair meetings of other Trustees at the organisation.
3. Baroness Gray noted that she is currently a Trustee at the USPCA, a position for which she had previously received advice from the Commission.
4. She stated that her role will not involve contact with, or lobbying of, government.
5. Baroness Gray was the Chief of Staff at the Prime Minister's Office from July 2024 to October 2024. Here she had oversight of the Prime Minister's Office's political staff and the work of special advisers across government. She also advised on a range of issues including government policy, party politics and communication strategies.
6. Baroness Gray stated she was not responsible for regulatory, funding or any other decisions affecting USPCA at any time in her last two years in the civil service.

The Commission's analysis

7. *Application level.* As a Level 1 application for an unpaid charitable trusteeship role, the Commission's analysis applies the principle that this category of appointment is generally recognised as posing a lower risk to government integrity.
8. *Risk of reward.* Baroness Gray stated she was not responsible for regulatory, funding or any other decisions affecting the USPCA. Baroness Gray currently holds a role as a Trustee at the USPCA, for which she has received advice from the Commission. The risk that the offer was made as a reward for decisions made during her time in office is low.

9. *Access to information.* As former Chief of Staff, Baroness Gray would have had access to a range of policy information. This risk is mitigated by the fact that over 19 months have passed since her last day in civil service, reducing the currency of any information she may still hold. The standard condition regarding privileged information covers any remaining risk.

10. *Improper influence.* As Chief of Staff, Baroness Gray would have a network of contacts in government that could provide an unfair advantage to USPCA. She has stated there will be no contact with government in her proposed role. The risk of the perception of lobbying the government in order to influence policy changes is mitigated by the standard conditions.