

Cabinet Office

3 July 2026

Paid appointment with Penta Group: Application under the Business Appointment Rules from Mr James Lyons, former Director of Strategic Communications 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 **James Lyons**, former Director of Strategic Communications at the Prime Minister's Office. The application is for a paid role as a Senior Partner at **Penta Group**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Mr Lyons is a former special adviser at Special Adviser Pay Band 4. His last day of service was 1 September 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 advice¹ is that the appointment should be subject to the following conditions:

1. Privileged information – Mr Lyons 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 the civil service.
2. Lobbying – For two years from his last day in the civil service, until 1 September 2027, Mr Lyons should not become personally involved in lobbying the UK Government or its arm's length bodies on behalf of Penta Group (including parent companies, subsidiaries, partners and clients). He should also not use, directly or indirectly, his contacts in government and/or civil service to influence policy, secure business/funding or otherwise unfairly advantage Penta Group (including parent companies, subsidiaries, partners and clients).
3. Bids and contracts – For two years from his last day in the civil service, until 1 September 2027, Mr Lyons should not provide advice to Penta Group

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

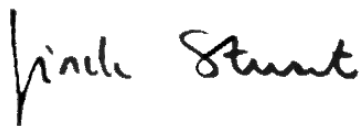
(including parent companies, subsidiaries, partners and clients) on a bid or contract relating to the UK Government or its arm's length bodies.

4. Engagement with government – For two years from his last day in the civil service, until 1 September 2027, Mr Lyons should not initiate engagement on behalf of Penta Group (including parent companies, subsidiaries, partners and clients) with the UK Government or its arm's length bodies.
5. Limitation to the role: unknown clients – For two years from his last day in office, until 1 September 2027, Mr Lyons is prevented from advising Penta Group or its clients on work regarding any policy or operational matter he had a material role in developing or determining, or where he had a material relationship with the relevant organisation, in his former role.

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

1. According to its website, Penta Group is an international stakeholder solutions and corporate advisory firm that provides businesses with communications, public affairs, and reputation management services.

Applicant assessment

2. As a Senior Partner, Mr Lyons stated he will advise Penta Group on communications, corporate affairs and strategy. He added that he will be responsible for business development in his role.
3. As Director of Strategic Communications at the Prime Minister's Office, Mr Lyons was responsible for overall government communications strategy.
4. Mr Lyons confirmed his role will not involve contact with government. He stated he had no official dealings with Penta Group, nor any involvement in policy development or decisions specific to the organisation, during his time in office.

Departmental assessment

5. The Cabinet Office noted that as Director of Strategic Communications Mr Lyons was responsible for the government narrative and his role was not policy or business focussed. The department added that Mr Lyons is returning to a communications career that existed prior to his time in government. The department stated that risk of the appointment being perceived as a reward for decisions made in office is therefore considered low.
6. The department noted that Mr Lyons would have been exposed to a broad range of emerging government strategy. However, because his former role was strictly focussed on communications rather than policy or business, the department considers the risk of him holding privileged information that offers a specific competitive advantage to be low. Furthermore, the department stated that nearly one year has elapsed since Mr Lyons left his role, meaning the currency of any retained privileged information will have diminished significantly. The department recommended that Mr Lyons should be reminded of his duties to maintain the confidentiality of any retained privileged information that he may retain.
7. The department said that the primary risk relates to Mr Lyons' high-level contacts and potential ongoing influence post-departure, combined with the fact that Penta Group operates with a largely unknown client list. They noted that whilst some clients are known as a result of declarations to the Office of

the Registrar of Consultant Lobbyists, there are likely other clients that the applicant may have worked with during his time in office. The department added that Penta Group has been a registered consultant lobbyist in the UK since 26 March 2015.

8. The department recommended that in addition to the standard conditions, a condition be applied to mitigate any remaining risk around unknown clients which prevents him from advising Penta Group (or its parent company, subsidiaries, or clients) on work regarding any policy or operational matter he had a material role in developing or determining, or where he had a material relationship with the company or organisation, during his time in government.

The Commission's analysis

9. *Risk of reward.* The Cabinet Office confirmed that as Director of Strategic Communications, Mr Lyons' role was not policy or business focused. He is therefore unlikely to have been involved in any policy, regulatory, or contractual decisions affecting the organisation during his tenure. The risk of the appointment being a reward for decisions made in office is low.
10. *Access to information.* As a senior Special Adviser at the Prime Minister's Office, Mr Lyons would have been exposed to privileged information about the government's legislative and policy priorities. However, Mr Lyons has an extensive professional background in the communications sector from his time before government, reducing the risk that potential clients will seek an unfair advantage through his knowledge gained in office. Since ten months have passed since he left office, any residual privileged information he may hold is likely to be limited in its currency. Risks relating to his access to information are appropriately mitigated by the standard conditions.
11. *Improper influence and engagement with government.* The Commission noted that Mr Lyons' proposed role with Penta Group will involve business development. There is an inherent risk that a former senior official might use contacts gained in office to secure business or public funding to unfairly benefit a new employer. However, the Commission found it significant that Mr Lyons stated his role will not involve contact with the UK Government. Furthermore, under the standard conditions, he is strictly prohibited from using his government network to secure business or funding, or from advising on bids and contracts relating to the UK Government. The Commission therefore determined that the direct risks associated with his business development responsibilities alone are limited.
12. Penta Group is a registered consultant lobbyist in the UK with a largely unknown client list. Given Mr Lyons' former seniority as a Special Adviser at

the Prime Minister's Office, there is a risk, real or perceived, that his network of contacts could be seen as offering commercial clients unfair access to government decision-makers. As the standard lobbying ban is insufficient to address this risk on its own, the Commission decided that Mr Lyons should also be prevented from initiating engagement on behalf of Penta Group.

13. *Limitation to the role: unknown clients.* Furthermore, as a communication company, Penta Group operates with unknown clients, there is a risk that Mr Lyons could advise a client with whom he had a material relationship while in office. To address this, the Commission agreed with the Cabinet Office that Mr Lyons should be restricted from advising Penta Group (or its parent company, subsidiaries, or clients) on any work regarding any policy or operational matters he had a material role in developing or determining, or where he had a material relationship with the company or organisation, during his time in office for a period of two years from the final day of service.