

Department for Health and Social Care

24 August 2026

Application to establish an independent consultancy under the Business Appointment Rules from Julian Hunt, former Interim Director General Technology, Digital and Data at the Department for Health and Social Care.

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 **Mr Julian Hunt**, formerly Interim Director General Technology, Digital and Data at the Department for Health and Social Care. The application is to rejoin his independent consultancy **Ashlar Advisory Ltd** as a Director. Further detail on the content of the application is in the Annex. The Commission's advice is required as Mr Hunt is a former civil servant at SCS Pay Band 3. His last day of service was 31 May 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 application to rejoin his independent consultancy - Ashlar Advisory Ltd - should be subject to the following conditions:

1. Privileged information – Mr Hunt 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 one year from his last day in the civil service, until 31 May 2027, Mr Hunt should not become personally involved in lobbying the UK Government or its arm's length bodies on behalf of Ashlar Advisory Ltd (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 Ashlar Advisory Ltd (including parent companies, subsidiaries, partners and clients). While the ban on lobbying central government and

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

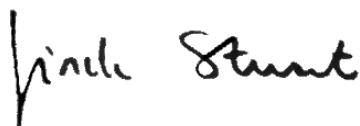
national NHS leadership remains, the Commission advises that Mr Hunt may engage with NHS bodies where such contact is restricted to regional Integrated Care Boards (ICBs) and local delivery (such as individual NHS trusts).

3. Bids and contracts – For one year from his last day in the civil service, until 31 May 2027, Mr Hunt should not provide advice to any company or organisation on behalf of Ashlar Advisory Ltd on a bid or contract relating to DHSC and its arm's length bodies.
4. Independent consultancy – For one year from his last day in the civil service, until 31 May 2027, given the likely scope of the consultancy work set out by Mr Hunt in his application, he does not need to return to the Commission for future client work unless the proposed work, or a change to existing work, would alter this scope. If Mr Hunt is uncertain, he should return to the Commission to seek advice. In particular, Mr Hunt would need to seek further advice related to:
 - Any client or work which requires him to engage with government.
 - Any client or work where Mr Hunt had direct involvement in related contractual, funding, or policy decisions while at the Department for Health and Social Care.
 - Any client or work relating to matters he held specific responsibility for as Interim Director General Technology, Digital and Data.

The Rules set out that civil servants must abide by the Commission's advice. It is Mr Hunt'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 Hunt must seek advice if he proposes to extend or otherwise change his role with Ashlar Advisory Ltd. 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. Mr Hunt is rejoining Ashlar Advisory Ltd (AAL), his independent consultancy service. He will serve as a Director. Mr Hunt had previously been a Director of the company but resigned this role in October 2025, prior to joining the government as Interim Director General Technology, Digital and Data at the Department of Health & Social Care (DHSC).

Applicant assessment

2. AAL provides senior advisory services in healthcare and health-technology commercial strategy, go-to-market, and digital transformation. It assists clients in accelerating business transformation using technology, digital, and data capabilities. He stated his work draws upon his long-standing strategic consultancy career, which includes senior leadership roles at IBM and PwC, and experience with public and private sector organisations, technology vendors, and professional services.
3. Mr Hunt said the work of AAL will not involve contact or dealings with his former department or government more generally.
4. Mr Hunt was Interim Director General Technology, Digital and Data at DHSC for eight months. He was employed by DHSC and mostly seconded to NHS England, to enable him to be part of the Executive and governance structures of both organisations and deliver a dual role.
5. As Interim Director General Technology, Digital and Data, Mr Hunt was responsible for leading the development of a strategic vision for technology, digital, and data services across the health and care sector, ensuring new technological and digital innovations are fully exploited by the NHS for the benefit of patients and service users. He oversaw system data, technology and digital transformation, products, platforms, live services, including key data and digital infrastructure. He was a member of the joint leadership group and participated in the Joint Executive Team, NHS England Executive, and DHSC Leadership Group. Mr Hunt was also accountable for various NHS England teams, including Digital, Data and Analytics, and Privacy, Transparency, and Trust, as well as DHSC teams, such as the Chief Data Officer and Digital Policy Units. He noted that cyber responsibilities, which were initially listed as part of his role for key data and digital infrastructure, were transferred to another colleague as of 23 December 2025.
6. Mr Hunt stated that his departmental dealings were confined to DHSC and the central functions of NHS England, and that he had no material dealings with the wider NHS (including NHS trusts, foundation trusts and integrated care boards), arm's length bodies or with the rest of the UK Government. Mr Hunt

added that commercial decision-making regarding the award of contracts was managed through DHSC and NHS England commercial governance. He said these decisions were made by commercial and financial officials in forums of which he was not a part.

Departmental assessment

7. The department noted that Mr Hunt is returning to his role with AAL, which did not arise from and is not connected to, any decisions taken by him in office. Given Mr Hunt's professional background and existing skills in consulting, DHSC determined that the risk associated with Mr Hunt re-joining his independent consultancy is limited, stating this represents a continuation of his established career. The department further clarified that because of his limited tenure and specific focus on the central NHS England technology strategy, Mr Hunt's contact with those outside of NHS England and DHSC was minimal, if any.
8. DHSC stated that in his role, Mr Hunt had access to high-level, system-wide information across health and care matters, which could provide an unfair advantage to a prospective employer. This included early-stage thinking on system-wide digital and data priorities, as well as strategic and assurance-level information on infrastructure, data platforms, and live digital services within DHSC and NHS England. It also involved top-level financial and delivery information for ongoing, largely legacy, digital and data programmes. DHSC noted, however, that this access did not include insight into detailed commercial or procurement decisions. Further, Mr Hunt also contributed to long-term strategic thinking on health technology, digital, and data policy, helping to communicate strategic vision and assess practical implementation and deliverability. The department further noted Mr Hunt's participation in senior decision-making forums, such as DHSC Leadership Group and joint DHSC/NHS England discussions, to provide a technology and data perspective.
9. The department stated that the risks associated with his access to information were limited by the short-term, interim nature of his eight-month appointment, which focused primarily on stewardship, continuity, and advice. DHSC said that while he accessed information of varying sensitivity, much of it related to publicly signalled or developing policy, often subject to ongoing legislative processes. Further, due to the rapid pace of change in digital and data policy, the majority of information he was privy to was also iterative and expected to evolve. DHSC also noted that because many initiatives were only at an exploratory or implementation-planning stage during Mr Hunt's tenure, the currency of the material would diminish quickly. While some material was sensitive in the short-term, the department confirmed the information was not

static or uniquely attributable to Mr Hunt, and is expected to enter the public domain through normal policy, legislative, or spending processes.

10. The department considered that the standard conditions provide an appropriate baseline to mitigate risks arising from Mr Hunt's access to information. However, to safeguard the appointment against criticism, and recognising both the seniority of his civil service appointment and its limited duration, the department recommended the following conditions:
 - *'no work on government contracts or contracts with NHSE/the wider health family for a period of one year from leaving government*
 - *no lobbying government or NHSE for one year from leaving government*
 - *Should not work with or advise on any contracts listed [in his application form]*
 - *a reminder that privileged information should not be used from the time of being in government to further interests outside government'*

The Commission's analysis

11. *Risk of reward.* As Mr Hunt is re-joining his independent consultancy, the Commission agreed with the department's assessment that the risk of the appointment being a reward for past actions or decisions in post is low. His return to Ashlar Advisory Ltd represents a continuation of his long-standing career in professional services and is not connected to decisions taken while in office.
12. *Access to information.* As former Director General, Mr Hunt had access to sensitive, high-level strategic thinking regarding the UK's health technology and data landscape. While this included early-stage thinking on digital and data priorities, the department assessed that his access was limited to strategic, infrastructure-level information and top-level financial data, with no insight into detailed commercial or procurement decisions.
13. In light of these factors, the Commission recognised the unique nature of Mr Hunt's interim role. This position is supported by the department's assessment of his tenure, which confirmed that because of his limited tenure and specific focus on the central NHS England technology strategy, Mr Hunt's time spent and contact with those outside of NHS England and DHSC was minimal. Given his localised focus, short tenure, and his pre-existing career in healthcare technology consulting prior to entering government, the Commission determined that a standard cross-government ban on bids and contracts would not be proportionate. Therefore the Commission has applied a restriction confined to DHSC and its arm's length bodies (including NHS England) to mitigate the risk involved in relation to Mr Hunt's consultancy.

14. For the avoidance of doubt, given Mr Hunt does not propose to have any contact with government, the Commission is satisfied that the risks are limited. Mr Hunt is permitted to work on or provide advice to any company or organisation on behalf of AAL on bids and contracts across the UK Government and its arm's length bodies, provided they do not involve DHSC or any of its arm's length bodies.
15. *Improper influence.* As a senior official, Mr Hunt would have a network of contacts in government that could provide an unfair advantage to potential clients of AAL. There is an inherent risk that his seniority could be perceived as offering clients unfair access to government decision-makers. Given the lobbying ban that applies to all former senior civil servants, Mr Hunt should not have any contact with ministers or officials that could reasonably be seen as seeking to influence the UK Government on behalf of his clients. As stated in the independent consultancy condition, should any future work involve engagement with government, he should return to the Commission for separate advice. This process allows the Commission to assess the propriety of specific engagements on a case-by-case basis.
16. *Independent consultancy.* This advice grants Mr Hunt consent to accept further consultancy client work without returning to the Commission, unless the proposed work extends or alters the scope of his consultancy's focus described in his original application. Specific circumstances requiring further applications to the Commission are set out in the conditions. The risks under the Rules will be most significant where Mr Hunt seeks to provide advice on matters he had direct involvement in, where he had a relationship with a proposed client as Interim Director General Technology, Digital and Data, or where work requires contact with government.
17. *Duration of conditions.* The Commission agreed with the department's recommendation that the proposed conditions should apply for a period of one year. This is appropriate and proportionate to the risks identified in this application. This conclusion reflects the two distinct factors specific to Mr Hunt's tenure: the limited length and the narrow, interim nature of his time within the civil service. Mr Hunt is still required to submit a separate application if he proposes to take up any external appointment outside of the remit of AAL before 31 May 2028.