

Department for Health and Social Care

26 August 2026

**Paid appointment with EY UK LLP: Application 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 (DHSC) for a period of eight months. The application is for a paid, part-time role as **Partner - Health Sector** at **EY UK LLP (EY)**. 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 advice<sup>1</sup> is that the appointment with EY should be made 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 EY (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 EY (including parent companies, subsidiaries, partners and clients). This ban does not preclude Mr Hunt from engaging with NHS bodies where such contact is

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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.

restricted to local delivery.

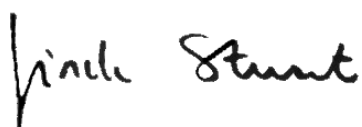
3. Bids and contracts – For one year from his last day in the civil service, until 31 May 2027, Mr Hunt should not provide advice to EY (including parent companies, subsidiaries, partners and clients) on a bid or contract relating to DHSC and its arm's length bodies. This prevents Mr Hunt from advising during the competitive phase of a project. He is, however, permitted to work on existing contracts or to undertake any resulting technical work once a contract is formally awarded, subject to the other conditions imposed.
4. Initiating engagement with government – For one year from his last day in the civil service, until 31 May 2027, Mr Hunt should not initiate engagement on behalf of EY (including parent companies, subsidiaries, partners and clients) with the UK government or its arm's length bodies.

EY and Mr Hunt confirmed their understanding of, and adherence to, the conditions that apply to Mr Hunt's role.

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 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, EY is a multinational professional services network headquartered in London, England. The company delivers business services which include assurance, consulting, strategy, tax, and transactions. It has historical and current contracts with the UK Government.

### Applicant assessment

2. As Partner - Health Sector, Mr Hunt's role will comprise two distinct senior positions: Cross Service Line UK Public Sector Health and Social Care Account Lead. For the Cross Service Line UK Public Sector Health role, Mr Hunt would provide internal team leadership and manage external relationships across EY's full suite of services (including audit, tax, real estate, and restructuring). For the Social Care Account Lead role, Mr Hunt said he would have responsibility for all EY consulting services to the UK health sector, spanning human capital, risk, cyber, governance, and technology implementation. Overall, Mr Hunt stated he will enable organisational transformation impacting patient experience, productivity and clinical outcomes, including using technology, digital and data capabilities.
3. Mr Hunt stated that EY uses a broad definition for the 'health sector', which includes industries that work with the sector such as insurance, technology, retail, finance, estates, and the third sector. The role will involve work in the UK and globally. Mr Hunt added that the role involves advising on the future organisational capabilities EY will require to capture new clients and deliver programmes, including partner organisations. He clarified that he will advise EY on its strategy and relationship approach to clients across the entire health and social care sector, including DHSC and NHS England central functions, as the core of the profession he would be returning to.
4. Mr Hunt stated his role will involve contact with DHSC, NHS England, other DHSC arm's length bodies and the wider NHS (trusts, foundation trusts and integrated care boards). He said he expected a significant element of that contact would be for the delivery of EY services, providing an update on the delivery of EY contracts or seeking feedback on the quality of service delivery. He stated he believed such contact would be reflective of the Business Appointment Rules guidance regarding: sharing factual information transparently (reporting via published research, opinion pieces, reports, annual reports, or through formal consultation) and using existing and therefore implicitly agreed frameworks for contacts within government (but not making use of privileged networks) for routine communication.

5. 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.
6. In this position, 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 and live services, and he was responsible for 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.
7. Mr Hunt stated this proposed role with EY is a continuation of the professional services career he held prior to his Interim DHSC role. This includes his time working through his own consultancy business, Ashlar Advisory Ltd (AAL), during which he provided consultancy services to EY. Prior to the closure of the EY contract with AAL, he was offered the Partner role by EY who agreed to defer his start date until after his interim DHSC tenure concluded. He also noted that he has over 30 years of experience in professional and technology services within the health sector, both internationally and extensively across the NHS.
8. Mr Hunt declared his previous consultancy work and his prospective employment with EY upon joining DHSC in October 2025. During his time in office, Mr Hunt said that he met with competitors of EY on several occasions. He also confirmed meeting with EY twice while in office, including at an NHS England event held at the EY London office in February 2026.
9. 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. He added that he was not involved in policy

development relating to EY during his time in office. To proactively manage potential conflicts, he noted that his formal Declaration of Interest stated he would recuse himself from any and all commercial decisions involving EY and take no part in any procurement processes. Mr Hunt clarified that while he was not involved in commercial decision-making, his management responsibilities included oversight of staff who worked on contracts with EY.

#### Correspondence with EY

10. EY confirmed its understanding of, and adherence to, the Commission's advice and the conditions imposed on Mr Hunt's appointment.

#### Departmental assessment

11. DHSC confirmed Mr Hunt's role in government was on a fixed-term, interim basis. The department stated that Mr Hunt did not exercise decision-making authority, nor hold material influence, over decisions affecting EY, its competitors, or any related commercial entities. The department further clarified 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, if at all. DHSC said that the role at EY could not be perceived as a reward for decisions made in office.
12. DHSC stated that in his role, Mr Hunt had access to high-level, system-wide information across health and care, 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.
13. 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, finalised or uniquely attributable to Mr Hunt, and is expected to move into the public domain through normal policy, legislative or spending processes.

14. DHSC highlighted that Mr Hunt was transparent from the start of his contract about his prior relationship with EY and his intention to return to the firm following his role in government. On this basis, the department said that appropriate restrictions had been in place throughout his employment with DHSC to manage potential conflicts.

15. The department recommended the following restrictions:

- For the period of one year, Mr Hunt should not be involved in bids or contracts relating to DHSC, NHS England or DHSC's arm's length bodies or programmes he had direct responsibility for during his tenure. The department clarified that this restriction was intended to operate as a broader commercial restriction across DHSC and NHS England, rather than being limited strictly to the specific programmes under Mr Hunt's direct responsibility.
- No lobbying DHSC or NHS England for one year from leaving government.
- Should not work with or advise on any contracts worked on by staff of whom Mr Hunt had oversight.
- A reminder that privileged information acquired from Mr Hunt's time in government should not be used to further interests outside government.

#### The Commission's analysis

16. *Risk of reward.* The Commission agreed with the department that the risk of the appointment being a reward for past actions is low. Mr Hunt's pre-existing role offer with EY and his transparency regarding this throughout his tenure limit the concern that the role was offered in exchange for specific decisions made in post.

17. *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 there is a clear overlap between his former

departmental oversight and EY's health sector portfolio, DHSC assessed that his access was limited to infrastructure-level information and top-level financial data. Given that his responsibilities and stakeholder relationships were concentrated within his former department and NHS England, the department recommended that any restrictions on bids and contracts be limited to DHSC and its arm's length bodies (including NHS England).

18. The Commission recognised the unique nature of Mr Hunt's interim role. Given his extensive professional career prior to joining the civil service for a limited eight-month tenure, the Commission determined that a standard cross-government ban on bids and contracts would be overly restrictive. This position is supported by the department's assessment, which confirmed that because Mr Hunt's responsibilities were concentrated entirely within the central NHS England technology strategy, his exposure and contact outside of NHS England and DHSC were minimal.
19. The Commission noted that although DHSC and NHS England remain distinct entities, as of November 2025, their policy and delivery functions have been unified under a joint executive team.<sup>2</sup> Therefore, as technology, digital, and data strategies are now co-authored and managed on this joint basis, the strategic insights Mr Hunt possessed cannot be separated between the two organisations. Imposing a ban on bids and contracts across both DHSC and its arm's length bodies reflects the assessment that material and perception risks remain. This is primarily a material risk, as his former seniority granted him privileged, non-public insight into early-stage strategic thinking, data infrastructure priorities, and top-level programme financial data, which could confer an unfair competitive advantage during procurement exercises. Additionally, the Commission acknowledged the inherent perception risk that arises when a former senior official immediately leaves the civil service to advise a major government supplier on procurement within their former area of oversight.
20. Consequently, the Commission agreed with the department that a restriction on bids and contracts across both DHSC and NHS England remained necessary. This restriction prevents Mr Hunt from advising during the competitive phase of a project, such as bid drafting or setting fees, where his privileged insight into future strategic priorities and top-level financial data could confer an unfair advantage over competitors. Conversely, once a contract is formally awarded, its scope, terms, and pricing are decided. The Commission therefore considered that sharing technical advice on existing contract execution does not pose the same risk of competitive advantage, provided he continues to observe the privileged information ban.

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<sup>2</sup> 18 September 2025, 'Joint Executive team to be set up across DHSC and NHS England', <https://www.gov.uk/government/news/joint-executive-team-to-be-set-up-across-dhsc-and-nhs-england>

21. As a result, this condition does not prevent Mr Hunt from working on existing contracts, which includes receiving progress reports, reviewing the delivery of ongoing services, or undertaking technical delivery once a contract has been formally awarded, subject to the other conditions imposed. Should Mr Hunt be uncertain about whether a specific contract or bid falls within this restriction, he should return to the Commission to seek further advice.
22. Providing Mr Hunt does not initiate engagement with government, he is permitted to work on, or provide advice to EY on, bids and contracts across the rest of the UK Government and its wider arm's length bodies. However, this work must not involve central DHSC or any of its arm's length bodies.
23. *Improper influence and engagement with government.* The Commission noted the significant perception risk that arises when a senior official moves to a prominent government supplier like EY. Although Mr Hunt did not hold information specifically relevant to the firm's commercial or lobbying interests, there is a risk his former seniority and professional network could be perceived to provide improper access or influence for EY's benefit. Further, Mr Hunt confirmed that he would have contact with DHSC, NHS England, and other health sector bodies in the role with EY. The Commission notes that this contact would be routine and for the purpose of service delivery updates, contract quality reviews, and sharing transparent factual information, which are allowed under the Rules. However, due to the nature of the firm and as Mr Hunt's role involves strategy and relationship approaches to clients across public sector health, the Commission has imposed a condition prohibiting Mr Hunt from initiating any engagement or direct contact with the UK Government on behalf of EY. The condition applied does not prevent him from responding to requests initiated by the government. It is Mr Hunt's personal responsibility to manage the propriety of his interactions and strictly adhere to the lobbying and engagement restrictions designed to mitigate any risk of improper influence.
24. The department suggested narrowing the lobbying ban to focus specifically on DHSC and NHS England. However, given Mr Hunt's former seniority as a Director General, the Commission concluded that permitting him to lobby other government departments, regardless of whether he has a specific pre-existing network, would create a significant perception risk regarding improper influence. To clarify, while the ban on lobbying central government and NHS England leadership remains, Mr Hunt may still engage with the wider NHS bodies at a local level.
25. *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.