

The Rt Hon. the Lord Deben



RT Hon Norman Lamb MP, Chair
Science and Technology Committee
House of Commons
London, SW1A 0AA

A handwritten signature in dark ink, appearing to read "Norman Lamb".

6 June 2019

Thank you for your letter. I am sorry that I did not receive it until recently - hence this tardy reply.

When I was appointed as Chairman of the CCC, I had a number of meetings with No 10 to ensure that none of my activities, including the chairmanship of Sancroft and the clients thereof represented a conflict of interest. I followed exactly the advice that was given and I had already resigned from positions which I thought could have presented a conflict of interest. I and Sancroft have maintained this approach throughout with a very clear policy not to engage in work which could be thought to be a conflict of interest. I attach the current iteration of that requirement and it hasn't changed in essence since I took on the CCC.

At the time of my appointment, I also consulted the Standards Commissioner in the House of Lords about my declaration in the Register of Interests and followed his advice to the letter.

Since then, because of a complaint raised as a result of the Mail on Sunday, I have provided the current Commissioner with full details of Sancroft's relationship with every company mentioned.

The CCC too has a strict policy on conflict of interest to which all members adhere. Where ever there is any doubt, I refer the question to the Compliance Officer and abide by her judgement.

Although I have been engaged in fighting Climate Change for more than thirty years, when I speak on Climate Change now I reflect exclusively the views of the CCC and any suggestion that I take any other interest into account - political, commercial, or personal - is entirely without foundation.

A handwritten signature in dark ink, appearing to read "Lord Deben".

Lord Deben
Chairman of the Committee on Climate Change

Procedure to avoid conflicts of interest

This document sets out Sancroft's process to ensure our work continues to present no conflicts of interest in relation to our chairman's membership of the Committee on Climate Change (CCC).

It is Sancroft's policy to ensure that we engage in no commercial business that presents such a conflict of interest. For the avoidance of doubt, this policy goes further than the rules set out by the CCC and the Cabinet Office, which oblige Lord Deben to declare conflicts and potential conflicts of interest, and to consider and implement actions to manage any such conflicts. Furthermore, Sancroft will accept no business that runs counter to the CCC [Managing Conflicts of Interests Policy](#).

This procedure was written so as to formalise our long-established ways of working and ensure the whole Sancroft team understands our position and is able to support it. In order to ensure that we put this policy reliably into practice, Sancroft's Executive Committee (ExComm) undertake a quarterly review of all existing and new contracts to ensure they have been examined against the principles in this document, and that no circumstances have changed that would affect a reasonable person's assessment of the facts, and therefore, the perception of a conflict of interest.

Sancroft's procedure is based on the following elements:

Sancroft's service offering:

1. Is Sancroft offering a service to the client that connects to the CCC's areas of interest or advice to the UK government on meeting its obligations under the Climate Change Act?

The client company:

2. Is the client's core business one that is directly affected by the work of the CCC?
3. Secondly, does the client company have activities or investments outside of its core business, which may be seen to be directly affected by the work of the CCC?

If the answers to the above questions are No, then no conflict of interest can reasonably be perceived, and no barrier to delivering the work in question exists.

If any of the above questions are answered Yes, ExComm will assign High, Moderate or Low risk rating to the various elements to determine how to proceed. Individual cases may be escalated as follows:

- Sancroft or the client may impose contractual restrictions on the work in question to reduce or eliminate any perceived conflict of interest.
- Sancroft may notify the CCC to request advice from the CCC as to whether any mitigating actions are required.
- Where projects demand a transparent resolution in the public domain, Sancroft will make a written declaration to the CCC chief executive and/or compliance officer seeking a response that clarifies the acceptability of any project based on the conflict of interest policy and rules to which CCC members are subject. This may include the option that Lord Deben would not participate in CCC deliberations where a conflict of interest may be seen to exist.

Sancroft