



## OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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### **BUSINESS APPOINTMENT APPLICATION: CONRAD PRINCE CB**

The Committee has been asked to consider an application from Conrad Prince.

Mr Prince was Cyber Security Ambassador at the Department for International Trade (DIT) from April 2015 to January 2018. Between November 2011 and March 2015 he was Director General for Intelligence and Strategy at GCHQ.

His last day in the Civil Service was 31 January 2018.

#### Appointment details

Mr Prince has sought advice on becoming a partner in Wychwood Partners (Wychwood), which he described as a “*small-scale specialist boutique consultancy, made up of former senior members of the UK defence and security community... the aim of Wychwood is to provide consultancy on issues relating to cyber security, digital operations, innovation and strategy. Client sectors likely to include insurance, banking, infrastructure, oil and gas and manufacturing, in the UK and internationally.*”

The Committee previously advised the founding partners of Wychwood, including General Sir Richard Barrons (Commander, Joint Forces Command). Sir Richard’s application explained that the work would be commercially focused, built around emerging technology and its cyber security. He said it would not be engaged in any government business.

Mr Prince informed the Committee that he had no official contact with Wychwood or its competitors. Neither has he had involvement in any policy decisions or regulatory work that may affect Wychwood, nor access to commercially sensitive information about any of its competitors. This was confirmed by DIT and GCHQ.

The Permanent Secretary at DIT countersigned this application. DIT and GCHQ both informed the Committee they have no reservations about Mr Prince joining Wychwood, subject to imposing the usual restrictions on lobbying and the use of official information and the requirement to submit individual commissions to the Committee for advice.

The departments noted that Mr Prince possessed detailed knowledge of the approach to cyber security in the UK and the threats to the UK. However, much of this knowledge is nowadays publicly available as Government is keen to ensure that UK companies are adequately prepared to defend themselves against cyber risks. The Government cyber security landscape is changing rapidly, and Mr Prince would not have access to Government's current views and approach after leaving the Civil Service.

DIT and GCHQ have confirmed that Mr Prince has had no previous dealings with Wychwood, which is a newly formed consultancy that is yet to establish a client base.

#### Committee's consideration

The departmental response suggests that the potential for Mr Prince to afford his clients an unfair advantage is limited, as the cyber security landscape is changing rapidly, and he would no longer have access to Government's current views and approach.

Given the connection with the field that Mr Prince worked in while in Government, the Committee considered it would be appropriate to impose an extended lobbying ban to make it clear this precludes him from making use of his contacts, directly or indirectly, to influence policy or secure business or funding for Wychwood's clients. The Committee has also imposed a condition prohibiting him from advising on the terms of a bid or contract relating to the work of the UK Government to address any residual risks that he might unfairly benefit Wychwood and its clients.

The Committee has imposed the same conditions on Mr Prince's involvement with Wychwood that were imposed on the founding partners. Given Wychwood's partners include the former Commander, Joint Forces Command; this includes a ban on working and advising on the UK Defence market.

The Prime Minister accepted the Committee's advice that his appointment with Wychwood Partners be subject to the following conditions:

- that he should not draw on (disclose or use for the benefit of himself or the organisations to which this advice refers) any privileged information available to him from his time in Crown service;
- for two years from his last day of service he should not become personally involved in lobbying the UK Government on behalf of those he advises under his consultancy or their subsidiaries, partners or clients. Nor should he make use, directly or indirectly, of his Government and/or Crown Service contacts to influence policy or secure business or funding on their behalf;
- for two years from his last day in post he should not work in or advise on the UK Defence market;
- for two years from his last day in Crown service, he should not provide advice to any company or organisation on the terms of, or with regard to the subject matter of, a bid or contract relating directly to the work of the UK Government; and
- for two years from his last day in Crown service, before accepting any commissions and or/before extending or otherwise changing the nature of any commission, he should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.

By 'privileged information' we mean official information to which a Minister or Crown servant has had access as a consequence of his or her office or employment and which has not been made

publicly available. Applicants are also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Civil Service Code or otherwise.

The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/Minister *"should not engage in communication with Government (Ministers, civil servants, including special advisers, and other relevant officials/public office holders) – wherever it takes place - with a view to influencing a Government decision, policy or contract award/grant in relation to their own interests or the interests of the organisation by which they are employed, or to whom they are contracted or with which they hold office."*

I should be grateful if you would ensure that we are informed as soon as the consultancy has been publicly announced (I enclose a form for this purpose). We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments which have not been taken up or announced, and this could lead to a false assumption being made about whether he had complied with the rules.

I should also be grateful if you would ask that Mr Prince informs us if he proposes to expand or otherwise change the nature of this work as, depending on the circumstances, it may be necessary for him to make a fresh application.

Once the consultancy has been publicly announced or commissions taken up under it, we will publish this letter on the Committee's website and include the main details of the application, together with the Advisory Committee's advice, in the regularly updated consolidated list on our website and in the next annual report.

Yours sincerely

Nicola Richardson  
Committee Secretariat

