



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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Air Vice Marshal Ian Morrison

The Committee has considered your request to accept a commission with Futurum Global (Futurm).

Application details

1. You said you will provide Futurum with military advice and international business development with military organisations, in line with your consultancy. Your consultancy was previously set up to provide: advisory support, focusing on corporate governance, structure, leadership, management development, along with providing advice on the design/development of strategic plans and delivery roadmaps, and business development.
2. Futurum describes itself as a technology, digital innovation and market disruption-focused strategy and research and analyst firm. Its website states it is a UK and Hong Kong based company that provides discreet and highly specialised training and consultancy to law enforcement, government agencies and the commercial sector internationally. Futurum states it has expertise in the fields of intelligence and covert tradecraft; intelligence analysis; social media security and threat prevention specialist interviewing and elicitation techniques; counter corporate espionage; and all aspects of financial crime compliance including counter proliferation finance and sanctions. The website also says it works with government agencies.
3. You told the Committee you had no dealings with relevant policy; nor were you involved in decisions regarding regulatory, grants or procurement whilst in your role as Director General Saudi Armed Forces Projects. You also confirmed that you did not have dealings (contractual or non-contractual) with Futurum while in service.
4. The MOD Business Appointments Panel considered your application and confirmed that you did not have contact with Futurum while in service; and that there is no relationship (contractual or non-contractual) between the MOD and Futurum. It also confirmed that due

to your role you would have access to MOD policy, plans and strategies as these relate to MOD Saudi Arabia Projects and the Kingdom of Saudi Arabia. However it considered the risk here was low. The MOD confirmed that whilst you had some official dealings with BAE Systems in office, you had no access to detailed commercial information or pricing by virtue of your role in office. It further stated that Futurum are not considered to be a competitor, so the risk this appointment could be perceived to give Futurum an unfair advantage through access to commercially sensitive information regarding competitors, is low. It also noted that due to your Senior Command and RAF service, you would have established many contacts across the MOD and wider Government.

5. Overall, the MOD considered the risks in you taking up this work under your consultancy were low; and the MOD Business Appointments Panel recommended that this work be subject restrictions which prevent you from:

- Using privileged information you had access to by virtue of your time in office;
- lobbying the Government and contacts developed during Crown service on behalf of your prospective clients,
- initiating contact with the Government or other contacts on matters relating to the Saudi Armed Forces project; and
- advising on bids and contracts with the MOD.

The Committee's Consideration

6. The Committee¹ considered this commission to be consistent with the terms of your consultancy, previously described as: advising on corporate governance, structure, leadership, management development, along with providing advice on the design/development of strategic plans and delivery roadmaps, and business development.

7. The Committee noted that you had no dealings (contractual and non-contractual) with Futurum while in service and was also not involved in commercial decisions that could have benefited Futurum. Further, there is no contractual relationship between the MOD and Futurum. Therefore, the Committee considered the risk this commission could reasonably be perceived as a reward for actions taken while in office was low.

8. The Committee considered that by virtue of your role as Director General Saudi Armed Forces Projects you could be seen to have access to general sensitive information regarding policy, plans and strategies especially in regards to Saudi Arabia. Further, whilst BAE Systems may not be a direct competitor of Futurum, both organisations operate in the intelligence sector. The Committee noted that whilst you were not in a commercially focused role, you were involved in the supply of defence equipment and support in Saudi Arabia and would have been sighted on high level information, including that related to BAE systems, which may be considered to be of benefit to a company with an interest in digital intelligence and security. The Committee considered the 16 months since you left Crown service significantly reduces the risk you had sufficiently up to date information that would be seen to proffer an unfair advantage to Futurum that cannot be mitigated by the conditions below.

9. The Committee also noted that due to your seniority and RAF service you will have built up a substantial network of contacts within the MOD and the UK Government in general. This is particularly relevant given Futurum's website states they interact with

¹ This application for advice was considered by Sir Alex Allan; Jonathan Baume; Baroness Angela Browning; Richard Thomas; Lord Larry Whitty; John Wood; and Mike Weir.

Government agencies. The Committee would therefore draw your attention to the conditions attached to your consultancy which prevent you from making use of contacts gained during your crown service to the unfair advantage of your clients; including the lobbying ban and the ban on advising your clients in relation to a bid or contract with the UK Government, including the MOD.

10. Additionally the Committee noted that you have confirmed you will not become involved in any work that involves Saudi Arabia or any countries considered as conflicting with the UK. However, to mitigate the risks here, the Committee considered it was necessary to restrict the scope of your work with Futurum as below.

11. In accordance with the Government's Business Appointment Rules, the Committee advises your commission with **Futurum Global** be subject to the conditions which apply to your independent consultancy:

- that you should not draw on (disclose or use for the benefit of yourself or the organisations to which this advice refers) any privileged information available to you from your time in office;
- for two years from your last day in Crown service, you should not become personally involved in lobbying the UK MOD on behalf of those you advise under your independent consultancy (including parent companies, subsidiaries and partners); nor should you or should you make use, directly or indirectly, of your MOD or government contacts to influence policy, secure funding/business or otherwise unfairly benefit those you advise under your independent consultancy (including parent companies, subsidiaries and partners);
- for two years from your last day in Crown service, you should not become personally involved in lobbying contacts you have developed during Crown service, such as at BAE Systems, and in other Governments, such as that of the Kingdom of Saudi Arabia, for the purpose of securing business for those you advise under your independent consultancy (including parent companies, subsidiaries and partners);
- for two years from your last day in Crown service, you should not provide advice to any company or organisation on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the UK Government, UK MOD, MODSAP or their trading funds; and
- for two years from your last day in Crown service, before accepting any commissions for your independent consultancy and or/before extending or otherwise changing the nature of your commissions, you 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.

In addition, as Futurum operates in the intelligence sector the Committee considered this commission with Futurum Global be subject to the following conditions :

- **for two years from your last day in Crown service you will not be involved with any work for Futurum Global (or its subsidiaries, partners or clients) related to Saudi Arabia; and**

- **You should ensure that the terms and scope of your engagement with Futurum Global include specific conflict management arrangements to avoid your working in areas of potential UK security conflict and that you should, where necessary, consult with the MOD as to the appropriateness of any particular assignment.**

12. 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 or otherwise.

13. 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."

14. I should be grateful if you would ensure that we are informed as soon as you take up this work, or if it is announced that you will do so. 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 you had complied with the Rules.

15. I should also be grateful if you would inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.

16. Once this commission has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

Yours Sincerely,

Isabella Wynn
Committee Secretariat