



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: ADMIRAL SIR GEORGE ZAMBELLAS

The Committee has been asked to consider an application from Admiral Sir George Zambellas, former First Sea Lord, who intends to operate a new start-up cyber security business called Cobweb Cyber Ltd.

Sir George was First Sea Lord between April 2013 and April 2016. His last day in Crown service was 21 August 2016.

As CEO of Cobweb Cyber Ltd Sir George will be responsible for the development and business performance of the company. He anticipates that his role will involve 100 days' work per year.

Cobweb Cyber will supply advice to CEOs and senior board members, in support of their responsibilities as directors, in order to better manage cyber risk across their businesses. Sir George has advised that the role is not likely to involve any contact with his former department or Government more widely.

The Committee regrets the fact that Sir George made arrangements to speak in his new capacity at the Institute of Directors Cyber Security Summit in advance of the Committee's consideration of his application.

When considering this application the Committee took into account that Sir George expects to provide advice to Health trusts or on health-related data management, but may also operate in the commercial maritime sector. It noted that he informed the MOD that he has not had any dealings with these organisations, or been involved in any decisions that might affect them, or been involved in any dealings with their competitors, during his last two years in office.

The Committee also took into account that the MOD Business Appointments Panel expressed no concerns about Sir George taking up this position, subject to behavioural conditions.

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, this appointment 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 in Crown service, he should not become personally involved in lobbying the UK Government on behalf of clients of Cobweb Cyber Ltd or those it advises, nor should he make use, directly or indirectly, of his Government and/or Crown service contacts to influence policy or secure business on behalf of its clients; and
- for two years from his last day of service he should not undertake any work as CEO of Cobweb Cyber Ltd that involves providing advice to any company or organisation involved in or on matters relating to the UK defence market.

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.

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 Sir George takes up this position, or if it is announced that he will do so (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 Sir George informs us if he proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him to make a fresh application.

Once the appointment has been publicly announced or taken up, 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