



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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Dear Mr Prince,

You sought the Committee's advice about taking up a commission under your independent consultancy. The Committee has now considered your application.

Commission details

You informed the Committee that you had been invited to become an Honorary Principal Research Fellow of the Institute for Security Science and Technology at Imperial College London. You said this is an unpaid, honorific role that will take up 'a *handful*' of days a year.

Imperial is a Academic Centre of Excellence in Cyber Security Research (ACE-CSR), as accredited by GCHQ, and is a leading centre for research into cyber security. You said you expect the role to involve engaging with cyber researchers at Imperial, giving the occasional talk, participating in Institute events and acting as an ambassador on cyber for the Institute.

You said you know the Director of the Institute, as he is a member of various UK Government committees relating to cyber security.

GCHQ confirmed that Imperial is in receipt of Government funding relating to its status as an ACE-CSR.

Your former Department, the Department for International Trade (DIT), confirmed that you had some contact with Imperial while in office, but neither DIT nor GCHQ are aware of you having been involved in decisions that would have directly benefited Imperial and neither department has any reservations about you taking up this appointment.

The Committee's consideration

The Committee¹ is satisfied that this role is consistent with the terms of your consultancy, which you described as providing strategic advice around cyber security, as well as on wider

¹ This application for advice was considered by Sir Alex Allan; Jonathan Baume; Baroness Browning; Lord Michael German; Terence Jagger; Baroness Helen Liddell; Richard Thomas and John Wood. Dr Susan Liautaud was unavailable.

risk and organisational strategy issues in a way that supports the UK's security and prosperity.

The Committee noted that this is an academic position, which is unpaid and will involve only a few days' work per year. While you had some contact with Imperial while at DIT, the Committee noted that neither DIT nor GCHQ are aware of you having been involved in decisions that would have directly benefited Imperial. Therefore, it assessed the risk of this honorific appointment being seen as a reward for decisions taken in office as low.

The Committee noted there is a funding relationship between GCHQ and Imperial as the University has been accredited as one of several Academic Centres of Excellence in Cyber Security Research. However, the conditions imposed on your consultancy would preclude the use of Government contacts to influence policy or secure business or funding on Imperial's behalf.

Under the Government's Business Appointment Rules, the Committee's advice is that this commission with Imperial should be subject to the following conditions:

- 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 Crown service;
- for two years from your last day of service you should not become personally involved in lobbying the UK Government on behalf of those you advise under your independent consultancy or their subsidiaries, partners or clients. Nor should you make use, directly or indirectly, of your Government and/or Crown Service contacts to influence policy or secure business or funding on their behalf. This would not prevent you from having routine contact with the UK Government on academic matters;
- 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 or contract relating directly to the work of the UK Government; and
- for two years from your last day in Crown service, before accepting any commissions and or/before extending or otherwise changing the nature of any commission, 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.

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 "*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 let me know when you take up this commission, or if it is announced that you are to do so. This will enable the Committee to publish this letter on the

Committee's website, and where appropriate, refer to it in the relevant annual report.

Yours sincerely,

Nicola Richardson
Committee Secretariat

