



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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Dear Mr Prince,

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

Commission Details

You informed the committee of a potential commission with VFS Global Group. You said this is a paid commission for round three days a month, for twelve months.

VFS Global Group (VFS) is a company that manages administrative and other tasks relating to visa, passport, identity management and other citizen services for 62 client governments worldwide. It serves countries such as Austria, Canada and Cyprus; and the UK. You have said the purpose of this commission would be to advise VFS on issues relating to cyber security, including reviewing VFS's current cyber security posture, making recommendations for improvements, supporting the company's head of Information Security, and advising the Board on matters relating to cyber security.

The Committee's consideration

The committee¹ is satisfied that the role is consistent with the terms of your consultancy which you describe as providing strategic advice around cyber security, as well as on wider risk and organisational strategy issues in a way that supports the UK's security.

The area in which VFS operates is unrelated to your previous role. While it is noted they have relationships with HMG, this is relevant to UK Visas and Immigration at the Home

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

Office rather than either of your former departments (Government Communications Headquarters (GCHQ) and the Department for International Trade (DIT)). You informed the Committee you had no contact with VFS during your time with GCHQ or DIT. As there is no clear overlap in the work of VFS, including its work with UKVI and your time in office, the Committee consider the potential risk this may seem a reward for decisions made in office is low.

The Committee noted there is a relationship between VFS and the Government (via UKVI), therefore there is a risk that your employer could stand to gain an unfair advantage over competitors, by virtue of your contacts in Government. However the conditions applied to your consultancy will mitigate this risk - as you are prevented from advising on the subject matter of, a bid or contract relating directly to the work of the UK Government. The Committee therefore considered the risk of unfair advantage is low, subject to the conditions below.

Under the Government's Business Appointment Rules, the committee's advice is that this commission with VFS Global Group should be subject to the following conditions (as have previously been applied 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 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;
- 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/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 could 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

Tiffany Amusu
Committee Secretariat

