



## 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 Beazley Group. You said this is a paid commission, 1 day a month for 12 months.

Beazley Group (BG) is an international insurance company specialising in underwriting and claims service. They are listed on the stock exchange and have clients in: Canada, France, Germany, Spain, Singapore, Australia and the UK.

You have said the purpose of this commission would be to advise BG on issues relating to cyber security, including: Consulting BG clients on cyber security, advising the BG Board Risk Committee and also advising BG on their cyber defence posture and how they manage risk from an insurance perspective.

Your former department, the Department for International Trade (DIT) stated that it has an '*insignificant*' relationship with BG, with contact being made between the two organisations only once; and, this was made outside of your former directorate. It confirmed you had no contact with BG while in office. As such, they recommended your application be '*subject to the normal requirements and restrictions around lobbying and the use of official information*'.

### The Committee's consideration

The Committee<sup>1</sup> 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 Committee noted the area in which BG operates is related to your previous role in Crown service, in that both are founded in cyber security. The Committee considered whether there might be a risk of unfair advantage of a result of the information you had access to. However, given the time that has passed since you were in post (14 months) and DIT's confirmation it has no concerns here, the Committee considered this risk was low. Therefore, the risk is appropriately mitigated by the conditions below.

The Committee noted it could be perceived your contacts gained in office may offer an unfair benefit to BG. However, the Committee considered this risk can be appropriately mitigated by the conditions applied to your independent consultancy, which prevent you from using contacts to the unfair advantage of BG; and prevent you from advising on bids and contracts with the UK Government.

Both you and DIT confirmed that you had no involvement with BG whilst in office and that there is no contractual relationship between BG and DIT. As such, the risk you could be seen to have been offered this work as a reward for decisions or actions taken in office is low.

Under the Government's Business Appointment Rules, the committee's advice is that this commission with Beazley 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

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<sup>1</sup> 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 and Richard Thomas; Dr Susan Liataud was unavailable.

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

Andrea Benjamin  
Committee Secretariat