



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

Room G/8, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

21 June 2019

Dear Mr Prince,

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

Commission Details

2. You informed the committee of a potential commission with Adeptis Group. You have confirmed that this is a paid commission, with a time commitment of six days' work a year.

3. Adeptis Group (Adeptis) is a recruitment company that specialise in roles for cyber security professionals. Adeptis provides advice and recruitment services to help clients attract and retain high quality cyber security professionals. It is headquartered in the UK and has over 80 clients across 10 countries.

4. You have said the purpose of this commission would be to advise Adeptis on the general security landscape; including in relation to what kind of roles are needed in certain areas of the industry. You explained that the role might involve some engagement with Adeptis' commercial clients.

5. You informed the Committee that Adeptis does not have a contractual relationship with the Department for International Trade (DIT); and that you had no official dealings with them when you were in office. This was confirmed by the Department.

6. The Department confirmed that while Adeptis have had some contact with DIT's regional trade teams, this was in an area of the organisation that you were not involved with. DIT did note that, whilst in office, you delivered a keynote address at an event which feature representatives from Adeptis among its attendees. This was consistent with your responsibilities as Cyber Security Ambassador.

7. The Department confirmed that they did not have any significant concerns about you accepting this role. However, DIT did suggest a possible restriction on you using your knowledge about the capabilities of existing DIT staff to head-hunt individuals on behalf of Adeptis, or their clients.

The Committee's consideration

8. 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.

9. The Committee noted that Adeptis does not have a contractual relationship with your former employer. The Committee were satisfied that the limited contact you would have had with Adeptis was consistent with your former role as Cyber Security Ambassador. For these reasons, the Committee took the view that the risk your appointment with Adeptis could be considered a reward for decisions you made while in office is low.

10. While Adeptis do not have a contractual relationship with DIT, the Committee noted that this could change in the future. The conditions imposed on your consultancy would preclude your involvement with any bid or contract relating directly to the work of the UK Government and thus appropriately mitigates the risk that you would provide Adeptis or their clients with an unfair commercial advantage over their competitors.

11. The Committee felt that there was a small risk that you may be perceived to hold information that is commercially sensitive and thus provides Adeptis with an unfair advantage over their competitors. However, the Committee noted the length of time that has passed since your last day in Crown service and the fact that the Department had no concerns in this area. The existing restriction applied to your consultancy, on the use of privileged information, lobbying and advising on bids and contracts appropriately mitigates any residual risk here.

12. Finally, the Committee agree with DIT there was a risk you could utilise your knowledge of the capabilities of departmental employees to head-hunt individuals on behalf of Adeptis or their clients. For this reason, they felt it necessary to impose a restriction on your head-hunting individuals, where you would only have access to knowledge of their skills and capabilities by virtue of your time in Crown service.

13. Under the Government's Business Appointment Rules, the committee's advice is that this commission with Adeptis 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;

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

- 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.

14. Additionally, your commission with Adeptis should be subject to the following condition

- for two years from your last day in Crown service, you should not draw on information concerning the capabilities of current employees of the Department for International Trade or other government departments or agencies, known to you by virtue of your time in Crown service, to actively initiate or assist head-hunting of those employees on behalf of Adeptis Group or their clients;

15. 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.

16. 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.*"

17. 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,

Jason Major

Committee Secretariat