



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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14 November 2019

Lt Gen Martin Bricknell

1. The Committee has considered your request to accept a commission with **Prometheus Medical Limited (Prometheus)**.

Commission details

2. You sought advice on taking up a commission with Prometheus as a Technical Consultant. You said the role would involve advising on the international military medical market to assist a UK business to increase its global business. This will be a paid, part time a daily rate for approximately 10 days per year.
3. You described Prometheus as a leading supplier of pre-hospital emergency medical equipment and high-quality medical training courses for a wide audience. Its website describes its services as providing in-depth knowledge, experience and credibility within both emergency medicine and the military environment to offer clients the best solution to their needs, from consultancy and strategic advice to the latest medical equipment and medical training.
4. You noted Prometheus had supplied some equipment to the UK MOD and had undertaken some training for UK personnel in the past, but you had no official dealings with them in office. The MOD were consulted on this role and it confirmed that Prometheus provided technical support to the development of future healthcare options split over several work packages. The MOD's spend on this work was approximately £10M.
5. The MOD confirmed there was 'no role' for you in this particular contract. It raised no concerns with this commission and recommended no additional restrictions be imposed (given those already applied via your independent consultancy)

The Committee's Consideration

6. The Committee¹ considered this commission to be consistent with the terms of your consultancy previously described as advising on military medical matters.

7. The Committee took into consideration that as Surgeon General, you were the professional head of the Defence Medical Services, responsible for: strategic planning for the delivery of healthcare in the UK and globally for all defence personnel. The MOD has had a significant spend with Prometheus that relates to your area of responsibility whilst at the MOD. The Committee understands your role included overseeing around 10,000 staff and would have had responsibility for the department, but the MOD confirmed you had no role in the awarding of these contracts. Further, you confirmed you had no official dealings with Prometheus. Therefore, the Committee considered the risk this commission could reasonably be perceived as a reward for actions taken while you were in office was low.

8. Given your role, the Committee considered it was likely you would have made strategic decisions relevant to Prometheus in broad terms, but took into account the MOD's confirmation it had no concerns about you taking up his commission. When commissions relate to an individual's time in office there are inherent risks associated with the sensitive information they may have had access to. Further, the Committee recognised your potential influence as the former Surgeon General, including the contacts you will have gained within the MOD/Whitehall. It may be perceived you could offer the company an unfair advantage in this regard. However, the Committee considered the time that has passed since you left your post (11 months) significantly reduces the risk associated with the information you would have access to and its likelihood to provide the company with an unfair advantage. Further, the conditions imposed on this work through your consultancy adequately mitigate the remaining risks. This includes a ban on advising on bids and contracts with the UK MOD, which is in keeping with your description of this role which will focus on Prometheus's global business.

9. In the circumstances, the Committee advises your commission with **Prometheus Medical Limited (Prometheus)** be subject to the conditions which were previously 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 to influence policy or secure business or funding on behalf;
- for two years from your last day in Crown service, you should not become personally involved in lobbying contacts you have developed during Crown service, within other Governments and organisations, for the purpose of securing business for your independent consultancy, its subsidiaries, partners or clients;
- 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 with, or relating directly to the work of, the MOD or its trading funds; and

¹ This application for advice was considered by Sir Alex Allan; Jonathan Baume; Baroness Angela Browning; Terence Jagger; Dr Susan Liautaud; Richard Thomas; Mike Weir; Lord Larry Whitty and John Wood.

- for two years from your last day in Crown service, before accepting any commissions for your independent consultancy and or/before extending or otherwise changing the nature of his commissions, 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 (including in particular the nature of any work in the UK defence sector).

10. 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.

11. 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."

12. 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

Catriona Marshall
Committee Secretariat

