



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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Lt Gen Martin Bricknell

1. The Committee has considered your request to accept a commission with **Universal Defence and Security Solutions (UDSS)**.

Commission details

2. You describe UDSS as providing policy, strategy and operational advice and consultancy services for governments and commercial organisations. UDSS is a relatively new company, founded by General Sir Richard Barrons and Peter Hewitt. According to their website, the company leads on policy, strategy and operational strategy for Governments, businesses and commercial organisations on topics of 'hybrid' and 'political confrontation', including: hard power capability, information operations and cyber warfare. Additionally, 'peace support, wider security, constabulary, humanitarian assistance and disaster relief.' It further states they are 'uniquely' able to 'draw upon the largest and broadest membership of former British Armed Forces personnel, regular and reserve from SNCO to 4 Star, as well as former MOD Civil Servants' to work with clients.

3. You sought advice on carrying out paid, commissioned (part-time) work for UDSS as a member of its Senior Leadership Team - heading up its 'Security Health' portfolio. You said your responsibilities would include recruiting members with expertise in this field and consulting on 'security health' matters. You said business development in this role would focus on the international market.

4. The MOD were consulted on this role and it confirmed it has no relationship with UDSS and you had no official dealings with them in office. The MOD raised no concerns with this commission.

The Committee's Consideration

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

6. Though this work relates to your time in office, the Committee considered there was no particular risk this could be considered as a reward for your time in office as Surgeon General, given UDSS had no relationship (commercial or otherwise) with the MOD.

7. In relation to access to sensitive information from your time in office, the Committee considered the time which has passed since you left post (11 months) significantly reduces the risk it could offer an unfair advantage to UDSS. Further, the conditions imposed on this work through your consultancy adequately mitigate any remaining risk.

8. The Committee noted the inherent risks in this application associated with it being in the same sector as your time in office, and considered them to be adequately mitigated by the conditions attached to your consultancy. 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 not involve any marketing or business activity related to the UK MOD.

9. However, as UDSS may ask you to consult on an adhoc basis, there may be potential risks associated with the unknown nature of its clients. Specifically, should they be a company or organisation you/the MOD had a commercial relationship with or where you had some influence in respect of their work whilst in post at the MOD. Therefore, the Committee considered it would be appropriate to impose an additional condition to prevent you from advising UDSS' clients where it involves working on matters you had involvement with in office.

10. The Committee also noted the risk you could be perceived to offer the company an unfair advantage to UDSS by virtue of your contacts within the MOD/Whitehall. Particularly, in relation to recruiting members with security health expertise. The Committee therefore considered it appropriate to apply an additional restriction which prevents you from drawing on inside knowledge of the capabilities of current MOD staff (only gained by virtue of your time in office) to unfairly recruit to UDSS.

11. In the circumstances, the Committee advises your commission with **Universal Defence and Security Solutions** be subject to the conditions which were previously applied to your independent consultancy, (and the two which follow below):

- 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 their 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;

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, 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
- 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).

12. In addition, the Committee considered this commission with **Universal Defence and Security Solutions** be subject to the following conditions:

- **for two years from your last day in Crown service, you should not advise Universal Defence Security Solutions or its clients on work with regard to any policy you had specific involvement or responsibility for as Surgeon General whilst at the MOD, or where you had a relationship with the company or organisation during your time as Surgeon General on behalf of the MOD; and**
- **for two years from your last day in Crown service you should not draw on information concerning the capabilities of current employees of MOD or other government departments or agencies, known to you by virtue of you time in Crown service, to actively initiate or assist head-hunting of those employees on behalf of Universal Defence Security Solutions or their clients.**

13. 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.

14. 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."

15. 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

Catrina Marshall
Committee Secretariat

