



## OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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### BUSINESS APPOINTMENT APPLICATION: MR CIARAN MARTIN, CB

1. The Committee has been asked to consider an application from Mr Ciaran Martin, Chief Executive at National Cyber Security Centre, part of GCHQ, on taking up an appointment with Garrison.
2. Mr Martin's last day in post and service will be 31 August 2020.

#### Application Details

3. Mr Martin applied to take up a paid, part-time role as Advisor for Garrison, a secure web browsing organisation providing a range of cloud platforms, transfer and isolation appliances. Mr Martin confirmed the role is unlikely to include contact with the Government and stated his responsibilities will be to:
  - Attend monthly calls meetings on corporate strategy
  - Advise generally on product and market development internationally
  - Helping with corporate events
4. Mr Martin stated Garrison has a relationship with the Government - that he did not meet with Garrison though confirmed members of his team supported the technical assessment and integrations on a project between Cabinet Office and the company. He stated he had no involvement in the award of this contract. He also confirmed he made no decisions regarding Garrison while in post, did not meet with or gain sensitive information on their competitors.
5. The National Cyber Security Centre (GCHQ) and the Cabinet Office were contacted regarding this application and confirmed the details given in Mr Martin's application, adding:
  - Garrison's bulk of work is not with the Government - there are 10 small contracts totalling £320K over 4 years regarding GCHQ. *'Ciaran had no direct or indirect involvement placing these small transactions as they were delegated within NCSC or were placed by other parts of GCHQ'*
  - Garrison have a £100K contract with the Cabinet Office. NCSC staff supported the technical assessment and subsequent integrations on this

project, however had *'no insight into commercial aspects or involvement of [the] final award. Ciaran had no involvement'*.

- He would have knowledge of UK Cyber firm strengths, but would not have gained commercial information on competitors or knowledge of their technical Internet protocol.
- *'Ciaran's role as CEO of the NCSC gave him a very public platform for the projects of the UK's approach to Cyber Security. All of its policy is already in the public domain. Any sensitive or detailed information is covered by his life-long OSA responsibilities. I do not believe this appointment would give Garrison an unfair advantage'*.

6. Neither department had any concerns with Mr Martin taking up this role.

### The Committee's consideration

7. When considering this application, the Committee<sup>1</sup> took into account that Mr Martin and departments confirmed he made no decisions regarding Garrison while in office. While members of NCSC assisted the Cabinet Office and Garrison on cyber security projects, he had no involvement in awarding contracts for Garrison. The Committee considered the risk he was offered the role for decisions made in post as low.
8. The Committee noted that whilst the role will not involve contact with the Government, due to his seniority and relationship between Government and Garrison, it would be improper for him to lobby the Government or advise on bids and contracts relating to the UK Government.
9. The Committee considered Mr Martin and department views that any privileged information on policy gained during his time in office is now in the public domain. To mitigate the risk of providing an unfair advantage through any retained information, the Committee would also draw Mr Martin's attention to the restriction that he should not draw on privileged information available to him from his time in post. (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.)
10. Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises this appointment be subject to the following conditions:
  - that he should not draw on (disclose or use for the benefit of the organisation to which this advice refers) any privileged information available to him from his time in Crown service;
  - for two years from his last day in Crown service, he should not become personally involved in lobbying the UK Government on behalf of Garrison (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his Government and/or Whitehall contacts to influence policy, secure business/funding or otherwise unfairly

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<sup>1</sup> This application for advice was considered by Sir Alex Allan; Jonathan Baume; Dr Susan Liautaud; Richard Thomas; Mike Weir; Lord Larry Whitty and John Wood. The Rt Hon Lord Pickles was unavailable.

advantage Garrison (including parent companies, subsidiaries, partners and clients; and

- for two years from his last day in Crown Service, he should not advise Garrison (including parent companies, subsidiaries, partners and clients) 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.

11. 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 or otherwise.
12. 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."
13. I should be grateful if you would inform us as soon as Mr Martin takes up employment with this organisation, or if it is announced that Mr Martin will do so, either by returning the enclosed form or by emailing the office at the above address. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments that have not been taken up or announced. This could lead to a false assumption being made about whether Mr Martin has complied with the Rules.
14. Please also inform us if Mr Martin proposes to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.
15. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website and in the relevant annual report.

Yours sincerely

Andrea Benjamin  
Committee Secretariat