



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Professor Ciaran Martin CB, Chief Executive at National Cyber Security Centre 2014 - August 2020

1. Professor Martin, former Chief Executive at National Cyber Security Centre (NCSC), part of Government Communications Headquarters (GCHQ), has sought advice from the Advisory Committee on Business Appointments (the Committee) under the Government's Business Appointments Rules for Former Crown servants (the Rules) on an appointment he wishes to take up with CyLon (Cylon) as an advisory board member. The material information taken into consideration by the Committee is set out in Annex A.
2. The purpose of the Rules is to protect the integrity of the Government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during time in office, alongside the information and influence a former Crown servant may offer Cylon.
3. The Rules set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

The Committee's advice

4. When considering this application, the Committee¹ took into account this role as an advisory board member is unpaid². Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of the Government by considering the real and perceived risks

¹ This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Sarah de Gay; Isabel Doverty; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir; Lord Larry Whitty. Dr Susan Liautaud was absent.

² By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

associated with former Crown servants using privileged access to contacts and information to the benefit of themselves or those they represent; and to mitigate the risks that individuals may make decisions or take action in office in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.

5. The Committee took into account that Professor Martin met with Cylon while in office, but these meetings were at conferences and other similar events. While there is a relationship between Cylon and NCSC it is not commercial but instead a stakeholder relationship. Further, the Committee noted he did not make any funding or policy decisions directly affecting Cylon.

6. The Committee noted that this proposed role overlaps with Professor Martin's time in office. Therefore, there could be a perceived risk he had access to relevant privileged information and knowledge, which could unfairly benefit Cylon. However, the unpaid nature of this appointment limits the real and perceived risk of Professor Martin making improper use of information they had access to while in office for their personal benefit. Further, Professor Martin's previous department, NCSC, has a purpose and commitment to be transparent; 8 months have passed since Professor Martin was in office; and he has an ongoing duty of confidentiality.

7. As above the Committee recognised that the risks in this unpaid appointment are limited. The Committee did not consider this appointment raises any particular proprietary concerns under the Government's Business Appointment Rules. The standard conditions below, preventing him from drawing on his privileged information and using his contacts to the unfair advantage of their new employer, will sufficiently mitigate the risks in this case.

8. Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises this appointment with **CyLon** be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the persons or organisations 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 CyLon (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage of CyLon (including parent companies, subsidiaries, partners and clients); and
- for two years from his last day in Crown service he should not undertake any work with CyLon (including parent companies, subsidiaries, partners and clients) that involves providing advice on the terms of, or with regard to the subject matter of a bid with, or contract relating directly to the work of the UK government.

9. Professor Martin must inform us as soon as he takes up employment with this organisation(s), or if it is announced that he will do so and we will publish this letter on our website.

10. Any failure to do so may lead to a false assumption being made about whether they have complied with the Rules.

11. Professor Martin must inform us if they propose to extend or otherwise change the nature of their role as, depending on the circumstances, it may be necessary for them to make a fresh application.

12. Once the appointment(s) has been publicly announced or taken up, we will publish this letter on the Committee's website and where appropriate refer to in the annual report.

Yours sincerely

Isabella Wynn
Committee Secretariat

Annex A - Material information

The role

1. Professor Martin said Cylon is an accelerator of cyber security business. The website states Cylon supports '*...startups and entrepreneurs building the secure foundations of our future digital economy*'. It states it does this in three different ways:

- Cylon Scale finds, grows and invests in leading global startups building the security technologies of the future
- Cylon Spark stimulates the creation of new cyber startups and the development of cyber skills
- Cylon Go provides opportunities for people from underrepresented backgrounds to pursue a cyber career

2. Professor Martin said his role as a member of the advisory board will involve providing strategic advice and providing communications on Cylon's behalf. He does not expect his role to involve contact with government.

Dealings in office

3. Professor Martin said Cylon is an important part of the '*UK's cyber security startup ecosystem*' and is part venture capital and part accelerator. He said Cylon's involvement as a key partner for the government in promoting innovation

predates his arrival in cyber security. He said he had very few direct dealings with Cylon other than at conferences etc but he did meet them.

4. Professor Martin confirmed he did not have any involvement in policy relevant to Cylon nor did he make any decisions affecting Cylon while in post. He also said he did not have access to sensitive information relevant to Cylon and did not meet with competitors of Cylon.

Department Assessment

5. GCHQ confirmed the details given in Professor Martin's application and stated it had occasional conversations with Cylon but no commercial relationship. It also stated Professor Martin's experience as CEO of NCSC gave him access to the UK's cyber security policy but stated this is generally already available to the public.

6. The department had no concerns with regards to this application.