



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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August 2021

**BUSINESS APPOINTMENT APPLICATION: Sir Alexander William Younger
KCMG, Vega Cyber Associates.**

1. Sir Alex Younger, former Chief of the Secret Intelligence Service (SIS), 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 Vega Cyber Associates (Vega) as a Partner. The material information taken into consideration by the Committee is set out in the annex.
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 Sir Alex's time in office, alongside the information and influence a former Crown servant may offer Vega.
3. The Committee considered whether this appointment was unsuitable given that in Sir Alex's former role as Chief of the SIS, he had broad access to information affecting all sectors. However, the Committee must also consider the information provided by the departments. The Committee has advised that a number of conditions be imposed to mitigate the potential risks to the government associated with this appointment under the Rules; this does not imply the Committee has taken a view on the appropriateness of this appointment for a former Chief of the SIS in any other respect.
4. The Rules set out that Crown servants must abide by the Committee's advice¹. 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 Consideration of the risks presented

¹ Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The Queen's Regulations and the Diplomatic Service Code

5. Vega is a start up company that will provide advice and services to underpin resilience, in particular in the cyber security domain. The Committee² noted that Sir Alex did not meet with Vega during his time in service and there is no relationship between Vega, SIS, or the Foreign, Commonwealth and Development Office (FCDO). As such, the Committee considered there is no reason it might be perceived this appointment is a reward for decisions made or actions taken from his time in office.
6. As the former Chief of the SIS, the Committee noted he would have had access to a range of particularly sensitive information, including that which relates to international risk and cyber/ technology. As a result it could be perceived he could offer Vega and its clients an unfair advantage in providing advice in this area. This could give an unfair advantage over their competitors as it might appear as though he can offer privileged insight into the cyber/ technology sector and the risks associated with it.
7. The Committee also noted due to Sir Alex's seniority and influence in government, there is a risk it could be perceived his network and influence might assist Vega unfairly. The Committee would draw Sir Alex's attention to the lobbying restriction and the restriction on providing advice on the terms of a bid or contract relating directly to the work of the UK government imposed below. These conditions will prevent him from providing an unfair advantage to Vega in respect to his contacts across the government. However, the Committee noted this was in keeping with his role as described.
8. Additionally, the Committee noted that Vega's potential clients are unknown. It is possible that he may be asked to advise clients who were affected by matters of policy that relate to policy areas or operational matters he had direct involvement in.

The Committee's advice

9. The Committee noted the department's confirmation that Sir Alex is bound by the Official Secrets Act and 9 months have passed since he was in office. Further he is subject to the below standard privileged information ban. As such, whilst Vega will undoubtedly gain from his profile, and his skills and experience in the sector, the risk he could use sensitive information to unfairly benefit Vega are mitigated.
10. Given the possible unknown nature of Vega's clients the Committee imposed a specific condition on this appointment which makes clear that in working with Vega, Sir Alex should not advise Vega or its clients on work with regard to any policy or operational matter he had specific involvement or responsibility for as Chief of the SIS.

² This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Sarah de Gay; Isabel Kiddy; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir; Lord Larry Whitty and Dr Susan Liautaud.

11. The Committee advises, under the Government's Business Appointment Rules, that this role with **Vega Cyber Associates** should 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 Vega Cyber Associates (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 contacts to influence policy, secure business/funding or otherwise unfairly advantage Vega Cyber Associates, Inc (including parent companies, subsidiaries, partners and clients); and
 - for two years from his last day in Crown service, he should not provide advice to Vega Cyber Associates (including parent companies, subsidiaries, partners and clients) 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; and
 - for two years from his last day in Crown service, he should not advise Vega Cyber Associates or its clients on work with regard to any policy or operational matter he had specific involvement or responsibility for as Chief of the Secret Intelligence Service, or where he had a relationship with the company or organisation during his time as Chief of the Secret Intelligence Service.
12. 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.
13. 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."*
14. I should be grateful if you would inform us as soon as Sir Alex takes up employment with this organisation, or if it is announced that Sir Alex 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 Sir Alex has complied with the Rules.

15. Please also inform us if Sir Alex proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him to make a fresh application.
16. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

Yours Sincerely,

Isabella Wynn
Committee Secretariat

Annex - Material information

The role

1. Sir Alex said Vega is a start up company that will provide advice and services to underpin resilience, in particular in the cyber security domain. Sir Alex said the company's aim *'sits very squarely with the stated aim of making cyber space a safe place for citizens both personally and at work'*. The applicant said there will be a strong initial focus on helping leaders meet the challenge of criminal ransomware. He said the company is not yet active but it will seek to advise senior leaders in a trusted environment on cyber security and digital resilience in all respects: technical, leadership, culture and organisational. Initially aiming for Continental European clients. He informed the Committee that the partners are Urs Rohner, former Chairman of Credit Suisse, Sadie Creese, professor of Cyber Security at Oxford University, and Martin Clements, a former colleague who left the government 5 years ago.
2. Sir Alex said he will take up a paid role with Vega as a Partner. He said he will provide resilience advice. He confirmed his role will not involve contact with the government.

Dealings in office

3. Sir Alex advised the Committee he did not meet with Vega while in service and there is no relationship between SIS and Vega. Sir Alex did say he met Urs and Sadie during the period he was in office but only occasionally and had no operational or commercial relationship with either, nor did he oversee any such relationship. As such was not involved in any commercial or contractual decisions relating to Vega. He also told the Committee he did not have any involvement in any relevant policy development or decisions that would have affected Vega and did not meet with its competitors; nor did he have access to sensitive information regarding these competitors.

4. Sir Alex stated that he was not the cyber lead for government when he was in office and that responsibility was held by GCHQ.

Department Assessment

5. The SIS, FCDO and the Cabinet Office all confirmed the details provided by Sir Alex. The FCDO confirmed it was not aware of any decisions Sir Alex made that had any direct impact, although Sir Alex will have been involved in wider discussions about security, cyber, and foreign policy. The SIS and FCDO confirmed by definition Sir Alex has in the past had access to privileged information relating to issues across the world. However, it confirmed Sir Alex remains bound by the Official Secrets Act.
6. All departments confirmed they had no concerns with this appointment and recommended the standard conditions apply.