



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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**BUSINESS APPOINTMENT APPLICATION: Air Marshal Martin Sampson CBE DSO, former Defence Senior Adviser to the Middle East and North Africa for the Ministry of Defence. Paid appointment with the International Institute for Strategic Studies.**

1. Mr Sampson 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 taking up an appointment with the International Institute for Strategic Studies (IISS) as an Executive Director of the Middle East.
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during Mr Sampson's time in office, alongside the information and influence a former Defence Senior Adviser to the Middle East and North Africa may offer the IISS. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. The Rules<sup>1</sup> 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.

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<sup>1</sup> Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code.

### The Committee's consideration of the risk presented

5. The Committee<sup>2</sup> noted there is no relationship between the MOD and the IISS. The MOD confirmed Mr Sampson had no involvement in any policy or contractual decisions specifically affecting the IISS or Middle East. Therefore, the risk that this appointment could be perceived as a reward is low.
6. Given his role at the MOD, Mr Sampson would have had access to insights and information relevant to his role in government, but not material specific to the IISS. The MOD said that it did not consider his access to pose a risk as he was not involved in the development of policy or strategy; rather his role was to promote and communicate the UK's agreed policy and strategy decision to its partners in the Middle East.
7. Mr Sampson would have had influence across government and gained contacts in government in other governments and organisations. It is relevant that Mr Sampson's role will not involve any contact or dealings with HMG and his role in government was focused on engaging and maintaining HMG relationships in the region in the defence realm. Given that Mr Sampson's role in government was focused on the Middle East and he will be based in the region for his role with the IISS, there is a risk that he could use his contacts in the region to unfairly advantage his employer.

### The Committee's advice

8. The Committee noted the mitigating factors above that help to reduce the risks associated with Mr Sampson's access to information. There are standard conditions which prevent individuals from making improper use of privileged information and contacts gained in office, which are set out below. The Committee would also draw Mr Sampson's attention to the condition preventing him using his contacts developed outside of government during his time as Defence Senior Adviser to the Middle East and North Africa to the unfair advantage of the IISS. The Committee noted this is entirely in keeping with his role.
9. The Committee advises, under the government's Business Appointment Rules, that Mr Sampson's role with **the International Institute for Strategic Studies** should be subject to the following conditions:

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<sup>2</sup> This application for advice was considered by Andrew Cumpsty; Sarah de Gay; Isabel Doverty; Hedley Finn OBE; The Rt Hon Baroness Jones of Whitchurch; The Rt Hon Lord Pickles; Michael Prescott; and Mike Weir. Dawid Konotey-Ahulu CBE was unavailable.

- 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 or any of its arm's length bodies on behalf of the International Institute for Strategic Studies (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage the International Institute for Strategic Studies (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service, he should not provide advice to the International Institute for Strategic Studies 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 UK government or any of its arm's length bodies; and
- for two years from his last day in Crown service, he should not become personally involved in lobbying contacts he has developed during his time in office in other governments and organisations for the purpose of securing business for the International Institute for Strategic Studies (including parent companies, subsidiaries and partners).

10. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's previous role in government only; they are separate from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests.<sup>3</sup> It is an applicant's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.

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, the Civil Service Code or otherwise.

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<sup>3</sup> All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers

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. You must inform us as soon as Mr Sampson takes up employment with this organisation, or if it is announced that Mr Sampson will do so. Please also inform us if Mr Sampson 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.
14. 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

Xante Chalwell  
**Committee Secretariat**

## Annex - Material information

### The role

1. Mr Sampson said that he will be working for the IISS in their Kingdom of Bahrain Office as an Executive Director for the Middle East. He said this is a paid and full time role.
2. Mr Sampson described the IISS as an independent British research institute in the area of international affairs.
3. Mr Sampson said his responsibilities will include:
  - a. Leading and directing the team in the delivery of the Manama dialogue<sup>4</sup> (a forum for ministers, and policymakers to discuss issues that affect the region and share solutions) as well as leading and directing the team in the delivery of any lectures and round tables as part of the institute's research business.
  - b. Directing and guiding the operations staff: contributing to the institute's research on the Middle East and North Africa, particularly in supporting and guiding the team of full time researchers and analysts. He said this could look like focussing the team on particular areas, proofreading, sense checking and critiquing/challenging.
  - c. Providing support to the IISS Singapore Office when it hosts the Shangri-La dialogue<sup>5</sup> (similar to the Manama dialogue mentioned above but focused on Asia). He said has no experience or exposure to the Far East, so would mainly be providing organisational support rather than contributing to the content of the event.
4. Mr Sampson said that his role would not involve any contact or dealings with government.

### Dealings in office

5. Mr Sampson said he had no official contact with the IISS when he was Defence Senior Adviser to the Middle East and North Africa and said he:
  - a. did not have any involvement in any relevant policy development or decisions that would have affected the IISS;

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<sup>4</sup> <https://www.iiss.org/events/iiss-manama-dialogue/>

<sup>5</sup> <https://www.iiss.org/events/iiss-shangri-la-dialogue/>

- b. does not have access to sensitive information that would provide an unfair advantage;
- c. had no commercial or contractual responsibilities relating to the IISS; and;
- d. did not meet with competitors of the IISS nor have access to sensitive information regarding competitors.

### Department Assessment

- 6. The MOD confirmed the details provided by Mr Sampson provided and added:
  - a. he only had contact with the IISS via its annual Manama Dialogue event as part of an official MOD delegation;
  - b. he had insight and access to UK policy relevant to his role in government but not specific to the IISS. It said his primary role was to inform and communicate agreed UK policy and strategy to partners, not to develop or own it.
  - c. he made no contractual or funding decisions. It said his role was focused on defence engagement and HMG relationship management.
- 7. The MOD said it attends and supports the IISS Manama Dialogue event as part of routine regional engagement. It said that it does not have any direct commercial or contractual arrangements with the IISS. It did say it purchases IISS publications through its standard products.
- 8. The MOD recommended that standard conditions should apply to this appointment.