



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

Room G/08, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)

Website: <http://www.gov.uk/acoba>

August 2023

### **BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: Sir Simon Gass KCMG CVO, former Chair of the Joint Intelligence Committee. Unpaid appointment with King's College London.**

1. Sir Simon 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 unpaid role he wishes to take up with King's College London as a Visiting Professor.
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 Sir Simon's time in office, alongside the information and influence he may offer King's College London. 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 set out that Crown servants must abide by the Committee's advice.<sup>1</sup> 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

---

<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

5. When considering this application, the Committee<sup>2</sup> took into account this appointment as Visiting Professor is unpaid.<sup>3</sup> 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 associated with former ministers joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions or take action in office to 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.
6. As the former Chair of the Joint Intelligence Committee, the Committee noted there could be a perceived risk Sir Simon would have had access to a range of particularly sensitive information. Government confirmed to the Committee it was not concerned about any specific information he had access to in relation to King's College London. It considered the standard waiting period in this case was sufficient given the unpaid nature of this appointment as it limits the real and perceived risk of Sir Simon making improper use of information he had access to while in government.

#### The Committee's advice

7. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. Whilst there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below, preventing Sir Simon from drawing on his privileged information and using his contacts to the unfair advantage of his new employer, will sufficiently mitigate in this case.
8. Under government's Rules, Sir Simon is also subject to a 3 month waiting period due to his seniority in government and the range of information he would be exposed to. This provides a suitable gap between his access to sensitive information and decision making and taking up this appointment.
9. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **King's College London** be subject to the following conditions:

---

<sup>2</sup> This application for advice was considered by Andrew Cumpsty; Jonathan Baume; Isabel Doherty; Sarah de Gay; The Rt Hon Lord Eric Pickles; Richard Thomas and Mike Weir.

<sup>3</sup>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.

- a waiting period of three months from his last day in Crown service;
- 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 King's College London (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 King's College London (including parent companies, subsidiaries, partners and clients); and
- for two years from his last day in Crown service, he should not provide advice to King's College London (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.

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

11. Sir Simon must inform us as soon as he takes up employment with this organisation, or if it is announced that he will do so and we will publish this letter on our website. Any failure to do so may lead to a false assumption being made about whether he had complied with the Rules.

12. He must also inform us if he 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.

13. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Yours Sincerely,

Isabella Wynn  
**Committee Secretariat**

## **Annex - Material information**

### The role

1. Sir Simon said he wishes to take up an unpaid, part-time role with King's College London where he will be a Visiting Professor.
2. Sir Simon said his role will involve occasional lecturing and mentoring of students. He said his role will have no contact with government.

### Dealings in office

3. Sir Simon advised the Committee that he did not make any policy or regulatory decisions specific to King's College London, nor did he meet them whilst in office.

### Departmental Assessment

4. The Cabinet Office confirmed the details Sir Simon provided and confirmed it does not have a relationship with King's College London.
5. The Cabinet Office said Sir Simon is a very senior civil servant in a sensitive area of public service. While it is possible that the applicant could have information that could be relevant to his new employer, there is nothing to suggest that this is a significant concern for this particular proposed role. It noted the proposed role is as a visiting professor and lecturer, rather than providing advice on the running of the organisation. As such, there is little chance that King's College would gain an unfair advantage from their work with the applicant. Further it stated this particular area of the Government's work and would not necessarily expose him to a wide range of undeclared policy information. Further he is subject to the usual waiting period for former SCS4 officials which will be sufficient to manage any risk of this nature.
6. The Cabinet Office did not have any concerns with the appointment and recommended the standard conditions as well as the standard 3 month waiting period.