



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: The Rt Hon Anne-Marie Trevelyan, former Minister of State for Indo-Pacific. Paid appointment with Goldilock.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) on your role as an Advisor with Goldilock.
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 you made during your time in office, alongside the information and influence you may offer Goldilock. 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 this appointment in any other respect - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. The Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, 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

5. There is limited overlap between your role as Minister of State for Indo-Pacific and your proposed role with Goldilock, a company with no current relationship with the FCDO. As Minister of State you did not meet with nor did you make

any decisions specific to Goldilock. Therefore, the Committee¹ considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.

6. As with any minister there is a risk in relation to your access to high level information that might be seen to benefit a company operating in this sector. In particular its interests in the defence/cyber security sector might intersect with issues you had some insight into in office. The FCDO's view was that the only relevant matters here would be briefings you received on infrastructure vulnerabilities to cyber - which is no longer privileged and/or relevant. It has also been nine months since you last had access to information.
7. As with any former minister, there are inherent risks associated with your contacts and influence within government and the potential for Goldilock to gain unfair access or influence as a result. You said that your role will not involve contact with government but will instead be focused on business in the private sector. Given that your role involves business development, there is a risk that any contacts you may have developed whilst in office, but outside of the UK government, could be used to secure business for Goldilock.

The Committee's advice

8. The Committee considered that the conditions below are sufficient to mitigate the risks related to this role. These seek to prevent you from making use of privileged information, contacts and/or influence gained from your time in ministerial office to the unfair advantage of Goldilock.
9. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Goldilock** be subject to the following conditions:
 - you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in ministerial office;
 - for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of Goldilock (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial office to influence policy, secure business/funding or otherwise unfairly advantage Goldilock (including parent companies, subsidiaries, partners and clients); and

¹ This application for advice was considered by Andrew Cumpsty; Isabel Doverty, Sarah de Gay; Hedley Finn OBE; Michael Prescott; Baroness Thornton; and Mike Weir.

- for two years from your last day in ministerial office, you should not provide advice to Goldilock (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 or any of its arm's length bodies.
 - for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you have developed during your time in office and in other Governments and organisations for the purpose of securing business for any company or organisation (including parent companies, subsidiaries and partners).
10. The advice and the conditions under the government's Business Appointment Rules relate to your 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' Interests². 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.
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 you take up employment with this organisation, or if it is announced that you will do so. Please also inform us if you propose 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.

² All Peers and Members of Parliament are prevented from paid lobbying under the the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your 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.

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.

Isabel Doverty

Interim Chair
ACOBA

Annex - Material Information

The Role

1. Goldilock is a cybersecurity firm. According to its website, its product - Goldilock, allows users to remotely and securely connect or disconnect assets from any network, without sending commands over the internet. It is a piece of hardware that physically disconnects critical data and devices from networks to eliminate internet-based vulnerabilities, then uses a secure, non-internet method to rapidly reconnect them. It can be used within various settings, including: critical infrastructure and operational technology; defence and security; healthcare; AI and internet kill switch (instant shut down of internet in the case of cyber attacks)
2. Goldilock received funding from Defence and Security Accelerator, which is part of the DSTL - arm's length agency of the MOD. This funding helped the company move from initial concept stage to market ready products

You said that you met with Goldilock's Chief Operating Officer at a conference. You seek to take up a part time, paid role as an Advisor. This will focus on strategic advice to the Board on expanding their private sector customer base in the UK. You said that this role will not involve contact with government.

Dealings in office

3. You told the Committee that as Minister for Indo-Pacific at the FCDO:
 - a. you did not meet with Goldilock while in office;
 - b. you did not make any policy, regulatory, operational or commercial decisions that were specific to Goldilock; and
 - c. you did not have any access to commercial information that could grant Goldilock an unfair advantage over its competitors.

Departmental Assessment

4. FCDO confirmed the details you provided and said there was no departmental relationship between FCDO and Goldilock. FCDO said that you were briefed on national security and critical infrastructure vulnerabilities to cyber but that this information was no longer relevant.
5. FCDO recommended standard conditions