

PROTECT [IL1]



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

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Richard Heaton  
Permanent Secretary  
Cabinet Office  
1 Horse Guards Road  
SW1A 2HQ

7 June 2013

Dear Mr Heaton,

**BUSINESS APPOINTMENT APPLICATION: VERITY HARDING**

The Advisory Committee on Business Appointments has considered the application from Verity Harding, Special Adviser to the Deputy Prime Minister, who is seeking permission to undertake a full-time, paid appointment as Public Policy Manager for Google UK Ltd. As you will be aware, as a former Special Adviser her application is required to be considered by the Advisory Committee, which provides advice to the relevant Permanent Secretary for a decision.

In considering this application, the Committee took into account the fact that, during her last two years of service, Ms Harding has not: had any official or contractual dealings with her prospective employer; or had access to any commercially sensitive information about any of her prospective employer's competitors. The Committee noted that Ms Harding advised the Deputy Prime Minister on issues that potentially impact on Google as an internet service provider but she had no direct role in the development or administration of any policy or decisions (including the award of grants) that could have affected her prospective employer or its competitors.

The Committee took into account that this appointment is likely to include contact and/or dealings with her former Department and Government more generally but that the contact will not involve representing Google's interests to Government. The Committee also took into account that Ms

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**Members:**

Mark Addison, Sir Colin Budd KCMG, Rt Hon Lord Dholakia OBE,  
Mary Jo Jacobi, Rt Hon Lord Lang of Monkton (Chairman), Rt Hon Lord Macdonald of Tradeston CBE  
Sir Hugh Stevenson, General the Lord Walker of Aldringham GCB CMG CBE

Harding had no access to departmental or Government information in her role as a Special Adviser that might give her prospective employer an unfair advantage. Furthermore, she has not had access to commercially valuable information that might be of benefit to her new employer. Finally, the Committee noted that she applied for an advertised post.

Taking into account all the circumstances, the Committee is of the view that the proposed appointment raises no particular propriety concerns under the Business Appointments Rules, provided that Ms Harding observes the following conditions:

- that she should not draw on privileged information available to her as a Special Adviser; and
- that for one year from her last day of service, Ms Harding should not become personally involved in lobbying UK Government Ministers or Crown servants, including Special Advisers, on behalf of her new employer, its parent company or its clients.

As you know, the Business Appointment Rules are designed to uphold the core values in the Civil Service Code and the aim of the lobbying ban is to avoid former Crown servants improperly exploiting access to contacts in Government.

As with all Special Advisers, the Committee makes this recommendation on the understanding that, if she has not already done so, Ms Harding must confirm in writing to your Department that she recognises that she continues to be bound by the provisions of the criminal law (including the Official Secrets Act), which protect certain categories of information, and by her duty of confidentiality owed to the Crown.

I should be grateful if you could inform us of your final decision and send us a copy of your letter to Ms Harding informing her of the outcome of her application. Please also ensure that we are told when Ms Harding takes up this post or, if earlier, when it is announced that she will do so. 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, and this could lead to a false assumption being made about whether she had complied with the Rules. In line with our usual practice, we will then publish brief details on our website (<http://acoba.independent.gov.uk>) including, with your agreement, a copy of your letter.

Finally, I should be grateful if you would ask that Ms Harding informs us if she proposes to extend or otherwise change her role with the Google UK Ltd because, depending on the circumstances, it may be necessary for her to make a fresh application.

Yours sincerely,



**Dean Ponder**