



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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You asked for the Committee's advice on providing advisory services to the following companies in your capacity as a Partner at Hanbury Strategy and Communications Limited (Hanbury).

The Committee noted that Hanbury offers companies, interest groups and charities strategic, campaigns and policy advice.

It considered the details of the Commissions as you described them below:

Second Home Ltd

Hanbury will be commissioned to provide strategic advice to the executive team of Second Home's London Office, in connection with new business opportunities for the company. The services will likely be provided for an initial period of 12 months.

Bulb Energy Ltd

The services envisaged concern the provision of strategic communications advice to the executive team of its London office. Hanbury will also advise on increasing Bulb's public profile. The services will likely be provided for an initial period of 6 months.

When considering these applications the Committee took into account that you did not have any dealings with these companies whilst in office and that neither commission will involve any contact with Government. Further, you have provided assurances to the Committee that you will not draw on any privileged information that was available to you during your time as a Civil Servant, and that you will not lobby Government on behalf of these organisations.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises these commissions be subject to the following conditions:

- you should not draw on (disclose or use for the benefit of yourself or the organisation to which this advice refers) any privileged information available to you from your time in Crown service; and

- for two years from your last day in service, you should not become personally involved in lobbying the UK Government on behalf of the organisations to which this advice refers, or their subsidiaries or clients. You should not make use, directly or indirectly, of your contacts in Government to influence policy or secure business on behalf of these organisations.

The Committee would expect you to seek further advice if you propose to extend or otherwise change the nature of your commissions and in relation to any new commissions, before taking them up.

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. (As with all Special Advisers, the Committee makes this recommendation on the understanding that, if you have not already done so, you must confirm in writing to your former department that you recognise that you continue to be bound by the provisions of the criminal law (including the Official Secrets Act), which protect certain categories of information, and by your duty of confidentiality owed to the Crown.)

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."*

I should be grateful if you would inform us as soon as you take up these commissions, or if it is announced that you 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 you had complied with the Ministerial Code.

Once these commissions have been publicly announced or taken up, we will publish this letter on the Committee's website and include the main details of the application, together with the Advisory Committee's advice, in the regularly updated consolidated list on our website and in the next annual report.

Yours sincerely

Sarah Parkington
Committee Secretariat