



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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You asked for the Committee's advice on providing services to The Faraday Institution 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.

Appointment details

You sought the Committee's advice about taking up a commission with the Faraday Institution, which was established to coordinate the research and development of battery technologies in the UK. It is funded by Government, through the Engineering and Physical Sciences Research Council (EPSRC), which is an executive, non-departmental public body, sponsored by the Department for Business, Energy and Industrial Strategy. The EPSRC was formed by a consortium of seven UK Universities.

The funding for the Faraday Institution is part of Government's £246 million investment into battery technology through industrial strategy; and was announced by the Business Secretary in July 2017.

You confirmed that Hanbury will provide communications advice for an initial period of four months; and that this work is not likely to include any contact or dealings with Government.

You confirmed the Faraday Institution was not something you worked on during your time in Government. Former Cabinet Office Minister, Sir Oliver Letwin, has taken up a role as Senior Adviser at the Faraday Institution. Hanbury confirmed the Faraday Institution invited Hanbury to pitch for the commission. Hanbury also told the Committee it is not aware of any reason this commission could be considered as a reward for decisions or actions taken by you whilst in office; and that this work was not related to any work you did with Sir Oliver whilst in office.

The Committee's consideration

The Committee notes this has some connection to your previous role, in so far as it relates to a government-backed initiative and it draws on your professional experience in

communications. However, you confirmed you had no involvement with this initiative and given the Faraday Institution was established a significant amount of time after you left office, this work is not directly related to your time in office. As such, the Committee does not consider that taking on this short term piece of work could reasonably be perceived as a reward for decisions or actions taken whilst in office.

Under the Government's Business Appointment Rules, the Committee must consider whether there is the potential for an organisation to be awarded an unfair advantage as a result of your time in office. Hanbury will be providing communications advice to the Faraday Institution, a government-funded initiative, which seeks to put the UK at the forefront of battery research and technology - and therefore increase economic growth. Given the nature of the organisation you will be working for and its purpose, the Committee does not consider this risk arises in this case; given it is not a commercial organisation which stands to benefit against its competitors.

The Committee also noted that it has now been approximately 19 months since you left Crown service.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises this commission 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 office you should not become personally involved in lobbying the UK Government on behalf of The Faraday Institution or its partners.

The Committee would expect you to seek further advice if you propose to extend or otherwise change the nature of your commission 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 this commission, 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 this commission has 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

