



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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You asked for the Committee's advice on providing services to Comcast Corporation 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 explained that Hanbury is considering entering into a formal advisory services agreement with Comcast Corporation (Comcast), a US-based telecommunications organisation. The services envisaged concern the provision of strategic advice.

You have stated that in providing the services, you would not draw on any privileged information which was available to you during your role in Government or lobby the current Government on behalf of Comcast in any way. Hanbury has confirmed that there will be no contact with the UK Government on this project.

You confirmed that you did not have any direct dealings with Comcast during your time in Government.

The Committee's consideration

The Committee is aware of no reason why it would be perceived that this commission is a reward for decisions made in office. It noted that Comcast is a US-based company and that you have confirmed that you had no direct dealings with Comcast while in office.

The Committee took into account that Hanbury has confirmed that there will be no contact with the UK Government on this project. It also noted that 21 months have passed since you left office, which limits the currency of any privileged information that you might have had access to while in post. The Committee concluded that the risk that Comcast might gain an unfair advantage as a result of your time in office is low.

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 Comcast Corporation or its subsidiaries or 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

Nicola Richardson
Committee Secretariat