



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: ROBERT HANNIGAN

The Committee has been asked to consider an application from Robert Hannigan, former Director, GCHQ, for advice on taking up appointments with Royal United Services Institute (RUSI) and Bletchley Park Trust.

Mr Hannigan's last day in the Civil Service was 30 April 2017.

Application details

RUSI

Mr Hannigan has been invited to become an unpaid Senior Associate Fellow at RUSI.

Mr Hannigan spoke at RUSI while in office and was on their advisory board (automatically by virtue of his position as Director, GCHQ).

GCHQ has confirmed that it works with RUSI closely, as do the other intelligence agencies and HMG more widely, and thus Mr Hannigan did so as Director, but it does not believe there is anything from his time at GCHQ that could cause a conflict of interest.

Bletchley Park Trust

Mr Hannigan proposes to become an unpaid trustee of Bletchley Park Trust, an unfunded independent museum and registered charity.

Mr Hannigan explained in his application that he is personally very committed to Bletchley as a heritage site and as an educational/cyber skills inspiration for the next generation. He visited many times while he was in office.

GCHQ has confirmed that while it has a close connection to the Trust, there is no financial relationship, nor anything else that could lead to a conflict of interest. Mr Hannigan had dealings with the Trust and visited several times whilst Director, as would be expected.

The Committee's consideration

The Committee has assessed these unpaid appointments to present no cause for justified public concern. There is precedent for former heads of Intelligence Agencies taking up Senior Associate

Fellow positions at RUSI. The Committee sees nothing improper in this given RUSI's role as an independent think-tank in the defence and security sector; and because former officials are prevented from using privileged information and, under the Government's Business Appointment Rules, from lobbying Government for two years after leaving office. Further, GCHQ has confirmed that there are no conflicts of interest arising from his time in office and the contact that he had with RUSI while he was Director of GCHQ.

Equally, the role as a Trustee at Bletchley Park Trust raises no propriety concerns under the Business Appointment Rules. Whilst there is, of course, a close connection between the Trust and GCHQ, there is no financial relationship and therefore, no reason to think that the Trust would stand to gain an unfair advantage by appointing Mr Hannigan.

Conditions

The Prime Minister accepted the Committee's advice that, in accordance with the Government's Business Appointment Rules, these appointments be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the organisation to which this advice refers) any privileged information available to him from his time in Crown Service; and
- for two years from his last day in service, he should not become personally involved in lobbying the UK Government on behalf of RUSI or Bletchley Park Trust.

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.

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 ensure that we are informed as soon as Mr Hannigan takes up these positions, or if it is announced that he will do so (I enclose a form for this purpose). We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments which have not been taken up or announced, and this could lead to a false assumption being made about whether he had complied with the rules.

I should also be grateful if you would ask that Mr Hannigan informs us if he proposes to extend or otherwise change the nature of his roles as, depending on the circumstances, it may be necessary for him to make a fresh application.

Once the appointments 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

Nicola Richardson
Committee Secretariat