



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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October 2017

Dear Mr Hannigan

You sought the Committee's advice about accepting commissions with Rubica and Schillings International LLP under the terms of your independent consultancy. The Committee has now considered your application.

Commission details

Rubica

You propose to take up an unpaid role on the Advisory Board of Rubica, a US 'start-up' company offering cyber protection to individuals.

You confirmed that you had no contact with them while you were at GCHQ and will not have contact with the UK Government on their behalf.

Schillings International LLP

You are also seeking advice in relation to joining the newly created Advisory Board of the law firm Schillings International LLP (Schillings). The Advisory Board will advise the partnership on its future direction and strategy. You will be expected to attend two meetings a year.

The position is unpaid, but expenses will be met, and Schillings' professional services will be made available to Board members if required and appropriate.

You had no contact with Schillings while in office.

The Committee's consideration

The Committee agrees that these commissions are consistent with the terms of your independent consultancy, which you described as - providing strategic advice on risk, primarily, but not exclusively, in the context of cyber security.

The conditions that apply to your independent consultancy are:

- that you should not draw on (disclose or use for the benefit of yourself or the organisations to which this advice refers) any privileged information available to you from your time in Crown service;
- for two years from your last day in Crown service, you should not become personally involved in lobbying the UK Government on behalf of any of your clients or those you advise, nor should you make use, directly or indirectly, of your Government and/or Crown service contacts to influence policy or secure business on behalf of your clients;
- for two years from your last day of service you should not undertake any work as a consultant that involves providing advice to any company or organisation on the terms of a bid or contract relating directly to the work of GCHQ; and
- for two years from your last day in Crown service, before accepting any commissions and or/before extending or otherwise changing the nature of any commission, you should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of your consultancy and consider any relevant factors under the Business Appointment Rules.

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 *"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 let me know when you take up these commissions, or if it is announced that you are to do so. This will enable the Committee to publish this letter and brief details on the regularly updated consolidated list on its website and in its next annual report.

Should your roles with Rubica or Schillings International LLP change the Committee would expect you to return to the Committee to seek further advice.

Yours sincerely,

Nicola Richardson
Committee Secretariat