



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

June 2017

The Committee has considered your request to accept a commission with AggregateIQ Data Services Ltd (AggregateIQ) 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.

AggregateIQ is a canadian based technology company headquartered in Victoria, British Columbia. It is a data analytics company that uses online advertising and social media to micro-target and reach potential voters.

The Committee noted that you stated Hanbury will provide broad strategic advice and assist with communicating its offering to clients. The services will likely be provided for an initial period of 12 months.

It also took into account that you confirmed you did not have any dealings with AggregateIQ whilst in office and that this commission will not involve any contact with Government. Further, you provided assurances to the Committee that you will not draw on any privileged information that was available to you during your time as a Crown Servant, and that you will not lobby Government on behalf of AggregateIQ.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises that 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 service, you should not become personally involved in lobbying the UK Government on behalf of AggregateIQ, its 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 AggregatIQ, its subsidiaries or clients.

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