



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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2 May 2018

Dear Mr Hannigan,

You sought the Committee's advice about accepting a new commission with BlueVoyant under the terms of your independent consultancy. The Committee has now considered your application.

Commission details

BlueVoyant is a cyber security firm (formed in August 2017 as BluestreamGlobal and since renamed). You have been asked to move from your current role as Chairman of the European Advisory Board to take up a new role in the organisation as Chairman of Europe. In your role as Chairman of Europe you note you will be responsible for building the European business for BlueVoyant. You have explained the company does not sell services to Governments and you do not therefore anticipate the role will involve contact with the UK Government. The position will be paid.

The Committee's consideration

The Committee agrees that this commission is 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 Committee assessed that, as BlueVoyant was formed after you left office, the position cannot reasonably be seen as reward for decisions made while in office. The risk of your appointment conferring an unfair advantage on BlueVoyant is also low given that you have explained that it does not conduct business with Governments. Whilst the Committee agrees this change in role, to become Chairman of Europe, is significant and warrants consideration by the Committee - in these circumstances the change does not present any particular risks. The Committee also took into account that GCHQ previously advised the Committee it had no reservations about you setting up a consultancy as described or, with you working with BluestreamGlobal (now BlueVoyant).

In this case, it considers the conditions attached to your consultancy adequately mitigate any residual risk.

Under the Government's Business Appointment Rules, the commission with BlueVoyant should be subject to the same conditions that apply to your independent consultancy, namely:

- 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 this commission, or if it is announced that you are to do so. This will enable the Committee to publish this letter on its website and, if appropriate, to refer to it in the relevant annual report.

Yours sincerely,

Nicola Richardson
Committee Secretariat