



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**  
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July 2022

**BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: Jack Doyle, former Director of Communications at 10 Downing Street. A paid appointment with Headland Consulting.**

1. Mr Doyle sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Crown Servants (the Rules) on an appointment Mr Doyle wishes to take up with Headland Consulting (Headland). The material information taken into consideration by the Committee is set out in annex A.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during time in office, alongside the information and influence a former Crown servant may offer Headland.
3. The Committee has advised that a number of conditions be imposed to mitigate the potential risks to the government associated with this appointment under the Rules; this does not imply the Committee has taken a view on the appropriateness of this appointment for a former Director of Communications at No.10 in any other respect.
4. The Rules<sup>1</sup> set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

The Committee's consideration

5. Mr Doyle did not meet with Headland nor their competitors whilst in post; and as Director of Communications he made no decisions specific to Headland. The Cabinet Office also noted the role was offered to him by someone he did not know,

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<sup>1</sup> Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The Queen's Regulations and the Diplomatic Service Code

after being headhunted by the company. The Committee<sup>2</sup> agreed with the Cabinet Office that the risk he was offered this role as a reward for decisions or actions taken in post is low.

6. As the former Director of Communications at Number 10, due to the breadth of his work, Mr Doyle would have gained general insight and had access to information that would likely be of benefit to any organisation. The department was not aware of anything of specific risk, confirming he had no commercial or contracting information. Further, the department confirmed as Director of Communications, his job function would have involved access to policy information shortly before publication/announcement, on a reactive basis. This, alongside the 4 months that have passed since he left his role and last had access to information lowers the risk that the information Mr Doyle holds is still current and likely to benefit his prospective employer.

7. The Committee noted there is a risk associated with the former Director of Communications at Number 10 joining an organisation that may look to campaign government on behalf of clients. It noted that his seniority and influence at the centre of government could be perceived to unfairly assist Headland should he seek to advise Headland or its clients on contracts related to the government, or if he were to lobby the government. This is especially relevant as Mr Doyle noted the role may involve occasional contact with the government in the normal course of business, for example if a client was invited to a stakeholder event organised by a government department. However, the Committee took into account Mr Doyle's role would not involve lobbying or influencing government. Further, the Committee considered it significant that there is no direct overlap with his work at No.10 and he is continuing his pre-No.10 career in media and communications.

8. The Committee also considered it was significant that Headland have confirmed Mr Doyle's duties will '*...explicitly not involve lobbying on behalf of its clients*' and it '*...will put in place appropriate measures in order to ensure that any restrictions, conditions and limitations that are placed upon Mr Doyle by ACOBA as a condition of employment are applied in full within our organisation*'.

9. There is also a risk related to Headland's unknown clients. As Mr Doyle will be advising clients that are unable to be confirmed in advance, there is a risk that he could advise clients he had contact with during government, or advising on matters he had involvement in whilst in post. Though the Committee noted his role was communications focused and so the risk here is limited.

10. The Committee agreed with the Cabinet Office and Mr Doyle that it was relevant to its consideration that he has experience in this sector prior to joining government; as a former a journalist.

### The Committee's advice

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<sup>2</sup> This application for advice was considered by Jonathan Baume; Isabel Doverty; Sarah de Gay; Dr Susan Liataud; The Rt Hon Lord Pickles, Richard Thomas and Mike Weir. Lord Larry Whitty and Andrew Cumptsy were unavailable.

11. The main risks in this application relate to Mr Doyle broad access to information as Director of Communications to the Prime Minister in Number 10, and his advising on unknown clients. However there are a number of mitigating factors as outlined above. In the circumstances the Committee imposed a condition specific to working with an advisory firm with unknown clients, which prevents him from working on matters he had a material role in developing whilst at No.10.

12. Mr Doyle confirmed there will be no lobbying of government in this role, in line with the expectations set out in the Rules. The Committee also noted Mr Doyle may come into contact with the government and would draw Mr Doyle's attention to the below lobbying ban. Whilst this would not prevent him attending events where he may come into contact with government, he must refrain from discussing matters on behalf of Headland or its clients - to do so would risk offering them unfair influence that could be in contravention of the lobbying ban.

13. The conditions below appropriately mitigate the remaining risks associated with Mr Doyle's access to information, and the potential he offers unfair access to government and privileged information as a result of his time in office.

14. The Committee's advice in accordance with the government's Business Appointment Rules is that this role with Headland Consulting be subject to the below conditions:

- he should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time in Crown service;
- for two years from his last day in Crown service, he should not become personally involved in lobbying the UK government or any of its Arm's Length Bodies on behalf of Headland Consulting (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage Headland Consulting (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service he should not provide advice to Headland Consulting on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of the UK government or any of its Arm's Length Bodies; and
- for two years from his last day in Crown service, he should not advise Headland Consulting (including parent companies, subsidiaries, partners and clients) on work with regard to any policy he had a material role in developing or determining or where he had a relationship with the company or organisation during his time as Director of Communications.

15. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate to rules

administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. It is an applicant's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.

16. 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 Ministerial Code/Civil Service Code or otherwise.

17. 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."*

18. Mr Doyle must inform us as soon as he takes up this work or if it is announced that he will do so. 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 Mr Doyle has complied with the Civil Service code. Similarly, he must inform us if he proposes to extend or otherwise change his role with the organisation as depending on the circumstances, it might be necessary for him to seek fresh advice.

19. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Andrea Benjamin  
Committee Secretariat

## **Annex A- Material information**

### The role

1. Mr Doyle said Headland is a corporate communications, campaigns and public affairs consultancy. On its website, it states that it provides a number of services, including: Issues and Crisis communications, Risk Communications, Sustainability Communications, Financial Communications and Public Affairs. It also provides insight pieces, some of which take a critical view on the government. It has a large range of clients, including: Ebay, Dreams, KFC, Lidl, Onefootball, Mulberry, London Luton Airport and many more. These include some government and public service clients.

2. Mr Doyle wishes to take up a paid, part time role as a Partner. He stated he will be consulting a 'diverse range of clients on safeguarding' and added: *'The role may involve occasional contact with the government in the normal course of business, for example if a client was invited to a stakeholder event organised by a government department. However it would not involve lobbying of the government or contacting government officials or ministers with a view to influencing Government decisions or policy on behalf of clients. I do not expect to be working with the government directly as Headland does not have any contracts with the Government'*.

### Dealings in office

4. Mr Doyle stated he neither had any dealings with, nor met with nor made any decisions specific to Headland while in office.

5. He does not know of any relationship between the organisation and his former department.

### Department Assessment

6. The Cabinet Office confirmed the details provided by Mr Doyle.

7. The Cabinet Office also stated:

- The information provided by Mr Doyle was accurate
- He did not meet with Headland.
- He did not have commercially sensitive information regarding competitors.
- Due to his position, he would have gained a wide range of sensitive information on policy shortly before publication/announcement, on a' reactive and rapid-turnover basis, rather than longer-term strategic thinking or changes in government policy. This lowers the risk that the information Mr Doyle holds is still current and could benefit his prospective employer.
- Headland has no contracts with No.10 or Cabinet Office, but has been awarded several contracts with Highways England (an NDPB of the Department for Transport)
- Mr Doyle made no decisions on the organisation or its competitors.

## Annex B- Letter from Headland Consultancy Limited

**Headland** 

**Headland Consultancy Limited**

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Catriona Marshall  
Office of The Advisory Committee on Business Appointments  
1 Horse Guards Road  
London  
SW1A 2HQ

Dear Catriona,

As you are aware, we have invited Jack Doyle to join Headland Consultancy Limited as a Partner. I understand that Jack has applied for ACOBA clearance.

Headland understands and respects the work of ACOBA. I can confirm that Jack's duties will explicitly not involve lobbying on behalf of its clients and we will put in place appropriate measures in order to ensure that any restrictions, conditions and limitations that are placed upon Jack by ACOBA as a condition of employment are applied in full within our organisation.

Please don't hesitate to contact me if you have any questions.

Daniel Mines  
Managing Partner

