



**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](mailto:acoba@acoba.gov.uk)

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

October 2024

**BUSINESS APPOINTMENT APPLICATION: William Tanner, former Director of the Prime Minister's Policy Unit and Deputy Chief of Staff at No.10. Application to establish a blog online.**

1. Mr Tanner approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown servants (the Rules) seeking advice on establishing a blog hosted online.
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during Mr Tanner's time in office, alongside the information and influence he may offer. The material information taken into consideration by the Committee is set out in the annex below.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
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.

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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 King's Regulations and the Diplomatic Service Code.

## The Committee's consideration of the risks presented

5. Mr Tanner proposes to establish a blog and to use the platform provided by Substack Inc ('Substack') for publication to paying subscribers. His income from the blog is derived wholly from those subscribers, not from the platform provider. Revenue streams paid to Substack are on a commission basis and therefore depend on subscribers to his newsletter. The Cabinet Office confirmed that Mr Tanner did not have involvement in any decisions specifically with Substack. The Committee<sup>2</sup> considered that the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
6. As the former Director of the Prime Minister's Policy Unit and Deputy Chief of Staff at No.10, there are inherent risks associated with Mr Tanner's privileged access to information and contacts which may be seen to be of general use to any media or publication entity. The risk associated with his access to information is limited given the transparent nature of this role.

## The Committee's advice

7. The Committee did not consider establishing the blog to raise any particular propriety concerns under the government's Rules, subject to the conditions below. However, the Committee would remind Mr Tanner that it is his responsibility to manage the propriety of the specific work undertaken within the blog. In particular, he must be careful not to offer any privileged insight as a result of his time in government – which the conditions below seek to mitigate.
8. The Committee advises, under the government's Business Appointment Rules, that this appointment to establish a newsletter, hosted on **Substack Inc.** should be subject to the following 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 government or its arm's length bodies on behalf of the newsletter (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his

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<sup>2</sup> This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; The Rt Hon Lord Pickles; The Baroness Thornton; and Michael Prescott. Sarah de Gay, Dawid Konotey-Ahulu CBE DL and Mike Weir were unavailable.

contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage the newsletter (including parent companies, subsidiaries, partners and clients); and

- for two years from his last day in Crown service, he should not undertake any work with the newsletter (including parent companies, subsidiaries, partners and clients) that involves providing advice on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of government or its arm's length bodies.
9. The advice and the conditions under the government's Business Appointment Rules relate to Mr Tanner's previous role in government only; they are separate from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests<sup>3</sup>. 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.
10. 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.
11. 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.*"
12. Mr Tanner must inform us as soon as he takes up this role, or if it is announced that he will do so. He must also inform us if he proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him to make a fresh application.
13. Once the appointment has been publicly announced or taken up, we will

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<sup>3</sup> All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

Yours sincerely,

Hamzah Rizvi

**Committee Secretariat**

## **Annex - Material Information**

### The role

1. Mr Tanner informed the Committee that he wishes to publish a blog for a fee. Mr Tanner stated the blog will be detailing the conversations he has with voters and experiences on the road during his travels across the USA. He stated this will be mostly free but with an option for people to subscribe to support the project. He stated his writing will not draw upon any privileged information from his time in government and will relate to US politics. He may draw inferences between US and UK politics but any references will be incidental and not draw upon any information or relationships he developed while in government.
2. Mr Tanner said he will use Substack Inc, an online platform, to publish, invite subscriptions to and otherwise administer the blog.
3. Mr Tanner confirmed his role will not involve contact with the UK government.

### Dealings in office

4. Mr Tanner advised the Committee that during his time in office, he did not meet with Substack and did not have access to information or make policy or regulatory decisions of relevance here.

### Department Assessment

5. The Cabinet Office confirmed the details Mr Tanner provided and recommended standard conditions be applied.