



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Matthew Doyle, former Director of Communications, Prime Minister's Office at No.10 Downing Street. Paid appointment with the Malta Film Commission.

1. Mr Doyle sought advice from the Advisory Committee on Business Appointment (the Committee) under the government's Business Appointment Rules for former Crown servants (the Rules) on taking up a role with the Malta Film Commission as Strategic Adviser.
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions taken and decisions made during Mr Doyle's time in office, alongside the information and influence he may offer the Malta Film Commission. The material information taken into consideration by the Committee is set out in the annex.
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 set out that Crown servants must abide by the Committee's advice.¹ 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 of the risks presented

¹ 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.

5. The Malta Film Commission is a public body owned by the Maltese government that promotes, develops, and supports the audio-visual and film servicing industry in Malta. It acts as an advisory body on film-related policies and provides support for local filmmaking and the film servicing sector. In June 2023, the Malta Film Commission and British Film Commission signed a Memorandum of Understanding with the aim of enhancing the collaboration between the UK and Malta screen industries, as well as facilitating film and high-end TV production between the two territories.
6. As a special adviser, Mr Doyle's role in government service precluded direct responsibility for or involvement in contractual and commercial decisions. The Cabinet Office stated that he did not meet with, nor was he involved in decisions specific to the Malta Film Commission. Therefore, the Committee² considered the risk that this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is limited.
7. Given his former role within No.10, there is a limited risk Mr Doyle may possess information which may be of interest to any employer, including possibly the Malta Film Commission. The Committee agreed with the Cabinet Office this is limited given:
 - his role is focussed on communications at No.10, not policy or operational decisions
 - that the Prime Minister is ultimately responsible for all UK government decisions, media and entertainment policy regulation under the responsibility of the Department of Culture, Media and Sport (DCMS)
 - his access to information was, for the most part, about external communications, meaning the vast majority of information he had access to was about information ready to be placed in the public domain at the time or in the relatively near future
 - the Cabinet Office is not aware of any access to information that would raise particular risks under the Rules
8. Mr Doyle confirmed his role as Strategic Adviser excludes any dealings with government, reducing the risk he could be perceived to be lobbying government – which all former senior Crown servants are prevented from doing for two years after leaving office.

The Committee's advice

² This application for advice was considered by Isabel Doverty; Hedley Finn OBE; Sarah de Gay; Dawid Konotey-Ahulu CBE DL; Michael Prescott; and The Baroness Thornton.

9. The Committee determined the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear that Mr Doyle must not make use of any privileged access to information, contacts or influence gained from his time in government to the unfair advantage of the Malta Film Commission.
10. The Committee's advice, under the government's Business Appointment Rules, is that this appointment with the **Malta Film Commission** 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 UK government or any of its arm's length bodies on behalf of the Malta Film Commission (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage the Malta Film Commission (including parent companies, subsidiaries, partners and clients); and
 - for two years from his last day in Crown service, he should not provide advice to the Malta Film Commission (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the UK government or any of its arm's length bodies.
11. The advice and the conditions under the government's Business Appointment Rules relate to an applicant'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' Interests³. 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.
12. 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

³ 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.

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.

13. 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.*'
14. Mr Doyle must inform us as soon as he takes up this work or if it is announced that he will do so. 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.
15. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

Hamzah Rizvi
Committee Secretariat

Annex - material information

The role

1. The Malta Film Commission is a government entity owned by the Maltese government that promotes, develops, and supports the audio-visual and film servicing industry in Malta. It acts as an advisory body on film-related policies and provides support for local filmmaking and the film servicing sector. The commission also works to attract international film productions to Malta, boosting the local economy.
2. In 2023, the Malta Film Commission and British Film Commission⁴ signed a Memorandum of Understanding with the aim of enhancing the collaboration between the UK and Malta screen industries, as well as facilitating film and high-end TV production between the two territories.

⁴ The British Film Commission is the national agency with a remit to maximise and support the production of international feature film and television in the UK. It's funded by the Department for Culture, Media and Sport, the Department for Business and Trade, and the British Film Institute.

3. Mr Doyle described his role as follows:

- it is a paid, part-time role
- he will help the Malta Film Commission with their strategic communications in the build-up to the Mediterranean Film Festival at the end of June 2025 – where he would be involved in promoting the event and Malta broadly in the US market
- he will not have contact with the UK government

4. Mr Doyle previously worked for the Malta Film Commission prior to working for Sir Keir Starmer. His previous role was to give strategic communications on how to promote Malta as a location for filming (similarly to his proposed appointment).

5. Mr Doyle stated that this work's initial focus is the Mediterranean Film Festival at the end of June 2025, and will then continue with the Malta Film Commission on a retainer basis.

Dealings in office

6. Mr Doyle stated he did not meet with, nor was he involved in any policy, commercial or regulatory decisions specific to the Malta Film Commission during his recent time in Crown service.

7. Mr Doyle stated he does not possess sensitive information that may provide the Malta Film Commission an unfair advantage.

Departmental assessment

8. The Cabinet Office confirmed the details of Mr Doyle's proposed appointment with the Malta Film Commission as he stated.

9. The Cabinet Office confirmed that Mr Doyle did not meet with, nor was involved in policy, commercial or regulatory decisions specific to the Malta Film Commission.

10. The Cabinet Office stated there is some risk, real or perceived, of Mr Doyle retaining privileged knowledge as he was exposed to a wide range of information that may provide valuable insight to the prospective employer and/or the production companies and projects it provides funding to. However, the department stated this risk is general and not specific to his appointment with Malta Film Commission nor raised concerns relating to any specific

information he may hold that provides an unfair advantage. Therefore, it considers the risk relating to his access to information to be limited.

11. The Cabinet Office noted a reminder that whilst Mr Doyle's work as described is short-term and focussed on promoting Malta and the Mediterranean Film Festival, he must come back to the department if the scope of his role has significantly changed in the instance that fresh advice or indeed a new application is to be considered.
12. The Cabinet Office recommended the standard conditions to appropriately mitigate the risks noted above.