

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Mr Robert Courts KC, former Solicitor General at the Attorney General's Office. Paid appointment with H/Advisors Cicero.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) to take up a paid appointment with H/Advisors Cicero as a Senior Advisor.
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 taken during your time in office, alongside the information and influence you may offer H/Advisors Cicero as a former minister. 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 Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, 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

5. H/Advisors Cicero is a strategic communications consultancy specialising in public affairs, regulatory insight, corporate communications, and integrated campaigns. Its clients include those in financial services, technology, energy, and sustainability. Its work involves public affairs, political engagement, policy advisory, polling, policy monitoring, risk and select committee training. It is registered with the Office of the Registrar of Consultant Lobbyists.¹
6. You said that your role as an advisor will focus on the aviation, maritime, and defence spheres. You said that you will assist with strategic counsel, policy positioning, stakeholder strategy and public affairs planning. In particular, you will focus on areas where deep sectoral expertise, experience, political policy and regulatory insight are required.
7. The Attorney General's Office (AGO) confirmed you did not meet with H/Advisors Cicero in office, nor were you involved in any policy, regulatory or commercial decisions specifically impacting H/Advisors Cicero. Therefore, the Committee² considered the risk that this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.
8. The AGO said that as Solicitor General you had access to information that is both sensitive and legally privileged. If disclosed, this could grant H/Advisors Cicero an unfair advantage. This risk is limited by the following factors:
 - you have been out of office for 11 months, which is likely to have reduced the currency of the information to which you had access; and
 - you are prevented from disclosing information pertaining to legal advice you have provided your clients as Solicitor General, through various external frameworks including the Bar Standards Board's Code of Conduct, Legal Professional Privilege, and the Law Officers' Convention.
9. There remains a risk relating to your access to information, which is most likely to arise should you be asked to advise H/Advisors Cicero or its clients on matters that overlap with your ministerial portfolio. This is somewhat limited given there appears to be little or no subject matter overlap with your proposed role at H/Advisors Cicero and your previous work at the AGO.
10. As you will be working for a consultancy that undertakes lobbying activities, there is a risk that you may be seen to engage in its lobbying work, which would be contrary to the lobbying ban that applies to all former ministers for two years after

¹ https://orcl.my.site.com/CLR_Public_Profile?id=00124000006QJ0nAAG

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

leaving office. You said that your role will not be government-facing and that you will not have any contact with government in this role.

The Committee's advice

11. You confirmed there will be no lobbying of the government in this role, in line with the expectations set out in the Rules. However, given its activity in this area, it would be difficult to manage the risks associated with any engagement you initiate with the government. The Committee's advice, therefore, is that you should have no direct engagement with the government on behalf of H/Advisors Cicero.
12. As the clients you will be working with are unknown, the Committee has imposed an additional condition. This makes clear that in working with H/Advisors Cicero you should not advise on work which materially overlaps with your responsibilities in government, should that risk arise.
13. It is also significant that H/Advisors Cicero has confirmed that your role will be appropriately ringfenced to adhere to the Committee's advice and the conditions attached – including that you will not be involved in any of its lobbying activities.
14. The remaining risks can be appropriately mitigated by the conditions below. These make it clear that you should not make use of your access to privileged information, contacts or influence gained from your time in ministerial office to the unfair advantage of H/Advisors Cicero.
15. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **H/Advisors Cicero** be subject to the following conditions:
 - you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in ministerial office;
 - for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of H/Advisors Cicero (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage H/Advisors Cicero (including parent companies, subsidiaries, partners and clients);

- for two years from your last day in ministerial office you should not undertake any work with H/Advisors Cicero (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, the UK government or its arm's length bodies;
 - for two years from your last day in ministerial office, you should not advise H/Advisors Cicero or its clients on any work with regard to any policy which you had a material role in developing or determining as Solicitor General, or where you had a relationship with the company or organisation during your time in this role;
 - for two years from your last day in ministerial office, you should not have direct contact with the UK government on behalf of H/Advisors Cicero (including parent companies, subsidiaries, partners and clients).
16. The advice and the conditions under the government's Business Appointment Rules relate to your 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.³ 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.
17. 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 or otherwise.
18. The Business Appointment Rules explain that the restriction on lobbying means that you *'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.'*

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.

19. You must inform us as soon as you take up employment with this organisation(s), or if it is announced that you will do so. Please inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.
20. Once the appointment(s) 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.

Isabel Doherty

Interim Chair
ACOBA

Annex – Material Information

The role

1. H/Advisors Cicero is a strategic communications consultancy specialising in public affairs, regulatory insight, corporate communications, and integrated campaigns. Operating from London and Brussels as part of the global H/Advisors network (owned by the Havas Group), the firm advises clients across sectors such as financial services, technology, energy, and sustainability. Its work involves political engagement, policy analysis, stakeholder mapping, media relations, and reputation management, often at the intersection of regulation, politics, and business strategy. H/Advisors Cicero is known for its expertise in navigating complex legislative and regulatory environments, providing clients with forward-looking intelligence and advocacy support. It is a registered consultant lobbyist with the Office of the Register for Consultant Lobbyists.⁴
2. You told the Committee that H/Advisors Cicero has a number of clients in the aviation, maritime, and defence spheres. You said that it is interested in engaging your advice to assist with strategic counsel, particularly in areas where deep sectoral expertise, experience, and political policy and regulatory insight are required. You also said that this would include providing discreet, behind-the-scenes input on policy positioning, stakeholder strategy, and public affairs planning, enhancing H/Advisors Cicero's offer to clients while drawing on your specialist knowledge and experience in these sectors. You said that you plan to enhance H/Advisors Cicero's client offering by drawing on your specialist knowledge in:
 - policy positioning
 - stakeholder strategy
 - public affairs planning
3. You also said that this will not be a government facing role, will not involve lobbying, nor any contact with government.
4. H/Advisors Cicero confirmed that it had read and understood this advice and that your role would be appropriately ringfenced such that you would not be involved in any lobbying, particularly as you are working in an advisory capacity.

Dealings in office

5. You gave the Committee the following information about your role as Solicitor General:

⁴ https://orcl.my.site.com/CLR_Public_Profile?id=00124000006QJ0nAAG

- You did not make any policy, regulatory, or commercial decisions that impacted H/Advisors Cicero;
- You did not meet with H/Advisors Cicero;
- You had no access to sensitive information that could grant H/Advisors Cicero or its clients an unfair advantage;
- You anticipate no overlap between the advice you will provide and your ministerial responsibilities.

Departmental assessment

6. The AGO confirmed you were not involved in any regulatory or policy decisions that impacted H/Advisors Cicero and said that there is no departmental relationship with the company.
7. The AGO stated you had access to sensitive and legally privileged information, including Law Officers' Advice, which, if disclosed, could be considered to offer an unfair insight/advantage to H/Advisors Cicero.
8. The AGO recommended the standard conditions to appropriately mitigate the risk relating to the access and use of any sensitive information you may possess. It also noted:

'In addition to legal privilege, Law Officers' advice is subject to the Law Officers' Convention, which provides that neither the existence nor content of any Law Officers' advice should be disclosed outside government without the Law Officers' explicit consent.'