



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

G/8 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>

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You asked for the Committee's advice about taking up a part-time, paid appointment with Holdingham Group Ltd. Holdingham provides confidential political and commercial intelligence analysis and advice to UK and overseas clients on strategic and risk issues.

Your role would involve being a Non-Executive Director and you have stated it is part-time and paid with a time commitment of around 10-12 days per year. When considering this application, the Committee took into account that you did not have any official dealings with Holdingham during your last two years in office nor are you aware of a relationship between your prospective employers and previous department, HM Treasury.

HM Treasury have commented they have no propriety concerns regarding this application.

The Committee sees no reason why you should not take up this appointment, subject to the following conditions:

- you should not draw on (disclose or use for the benefit of yourself or the organisations or persons to which this advice refers) any privileged information available to you in your time as a Minister; and
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK Government on behalf of Holdingham Group Ltd, its subsidiaries, partners or its clients.

By 'privileged information' we mean official information to which a Minister 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.

Also, it might be helpful if I add that the Business Appointment Rules explain that the restriction on lobbying means that former Ministers "should not engage in communication with Government – including Ministers, special advisers and officials – with a view to influencing a Government decision or policy [including applications for awards or grants] in

relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted”.

I should be grateful if you would inform us as soon as you take up this appointment, or if it is announced that you will do so, either by returning the enclosed form or by emailing the office at the above address. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments which have not been taken up or announced. This could lead to a false assumption being made about whether you had complied with the Ministerial Code. Similarly, I should be grateful if you would inform us if you propose to extend or otherwise change your role as, depending on the circumstances, it may be necessary for you to seek fresh advice.

Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee’s website and include the main details of the application, together with the Advisory Committee’s advice, in the regularly updated consolidated list on our website and in the next annual report.

Baroness Browning

The Lord Deighton KBE