

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

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

May 2017

Ameetpal Gill OBE

The Committee has considered your request to accept a commission with the Red Tape Initiative, (RTI) in your capacity as a Partner at Hanbury Strategy and Communications Limited (Hanbury).

The RTI, a nonpartisan project to 'forge a consensus on the regulatory changes that could benefit both businesses and their employees in a post-Brexit Britain.' The RTI is a cross-party initiative and includes those from both sides of the debate; those who voted to leave the European Union, and those who voted to stay.

The RTI has an Advisory Board, which includes leading Conservative, Labour and Liberal Democrat politicians. It works with organisations such as the Trade Union Congress, the Confederation of British Industry and the Federation of Small Businesses to identify changes that could be made with EU regulation, which would bring benefits for jobs and businesses in the UK.

You stated that the proposed commission is for a twelve-month period, and that the advisory services provided to the RTI will consist of in-house research conducted by Hanbury's research team. Mr Simon Evans, another Partner at Hanbury, provided further information on this commission, stating that the research will consist of a series of reports based on publically available information for example; statutes, academic writing, media etc. It will be in short documents, presented to the RTI in order to better inform its own campaign and supplement their own research efforts. Throughout the research project, Hanbury will not be working with other organisations and any work done with other organisations by the RTI, will be independent of Hanbury.

When considering this application, the Committee took into account the assurances provided that:

- You did not secure the contract with the RTI, rather it was secured by other members
 of the wider Hanbury Team, and you will not be involved in the services provided to
 the RTI the work will be carried out by Hanbury's research team.
- You have had no previous contact with Sir Oliver Letwin (Chair of the Management Board at the RTI), or other RTI Members of the Board or Advisory Panel, since you established Hanbury.
- You and Hanbury made assurances to the Committee you will not lobby Government on behalf of the RTI or use any privileged information that was available to you during your role in Government.
- This commission is not likely to involve any contact with Government the research produced will consist of reports based on information in the public domain.

In accordance with the Government's Business Appointment Rules, the conditions that apply to your consultancy are:

- you (or Hanbury Strategy via you) should not draw on (disclose or use for the benefit
 of yourself or the organisation to which this advice refers) any privileged information
 available to you from your time in Crown service; and
- for two years from your last day in office you (or Hanbury Strategy on your behalf) should not become personally involved in lobbying the Government on behalf of Red Tape Initiative (or its partners), or make use, directly or indirectly, of your contacts in Government and/ or Crown service to influence policy or secure funding on behalf of Red Tape Initiative and its partners.

As before, the Committee would expect you to seek further advice if you propose to extend or otherwise change the nature of your commissions and in relation to any new commissions, before taking them up.

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. (As with all Special Advisers, the Committee makes this recommendation on the understanding that, if you have not already done so, you must confirm in writing to your former department that you recognise that you continue to be bound by the provisions of the criminal law (including the Official Secrets Act), which protect certain categories of information, and by your duty of confidentiality owed to the Crown.)

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."

I should be grateful if you would inform us as soon as you take up this commission, or if it is announced that you will do so. This will enable the Committee to publish this letter and brief

details on the regularly updated consolidated list on our website and in the next annual report.

Yours sincerely

Sarah Parkington

Committee Secretariat