



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

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You asked for the Committee's advice on providing advisory services to KPMG LLP in your capacity as a Partner at Hanbury Strategy and Communications Limited (Hanbury).

The Committee noted that Hanbury offers companies, interest groups and charities strategic, campaigns and policy advice. It considered the details of the commission with KPMG LLP as you described below:

**Adviser at KPMG LLP**

KPMG LLP is a UK limited liability partnership, and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative. Hanbury Strategy will provide policy advice to members of KPMG LLP's London office in connection with the impact of Brexit. The services will likely be provided for an initial period of 6 months.

When considering this application the Committee took into account that you confirmed you had no dealings with KPMG LLP whilst in office and that it is unlikely this commission will involve any contact with Government. In addition, the Committee noted that the Government's strategy on leaving the European Union has moved on from your time in office; and is available in the public domain.

Further, you stated in your request for advice that you will not draw on any privileged information that was available to you during your time as a Civil Servant, and that you will not lobby Government on behalf of any of KPMG LLP.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises that the commission with KPMG LLP be subject to the following conditions:

- 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 service, you should not become personally involved in lobbying the UK Government on behalf of KPMG LLP, its parent companies, subsidiaries or clients. You should not make use, directly or indirectly, of your contacts in Government to influence policy or secure business on behalf of KPMG LLP, its parent companies, subsidiaries or clients.

The Committee would expect you to seek further advice if you propose to extend or otherwise change the nature of your commission 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, 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 that 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.

Once this commission 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.

Yours sincerely

Sarah Parkington  
Committee Secretariat