



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: DAME LOUISE CASEY DBE CB

The Committee has been asked to consider an application from Dame Louise Casey, former Director General at the Department for Communities and Local Government (DCLG), now the Ministry of Housing, Communities & Local Government (MHCLG).

Appointment details

Dame Louise has been invited to become a member of KPMG's Advisory Board on Inclusion. She informed the Committee that this is a paid appointment and she would be one of four external advisers, providing advice/ support to the KPMG Deputy Chair and team on inclusion and diversity issues, such as women in the workforce. The Inclusion Advisory Board meets four times a year.

Dame Louise explained that the appointment is not likely to include any contact or dealings with Government. She informed the Committee that she had no official contact with KPMG during her time in Government, contractual or otherwise, and was not involved in any policy or funding decisions that may have affected it. She has declared that she had no official dealings with its competitors over her last two years in service and no access to commercially sensitive information about any competitors. This was confirmed by MHCLG.

This application has been considered by the Director General in MHCLG who oversees the Integration portfolio as the appointment has some indirect relationship to that work. The Permanent Secretary has also seen the application. The department commented:

"Louise's application makes it clear that she had no official dealings with KPMG or their competitors in the last two years of her Civil Service career and had no access to privileged or sensitive information relating to integration policy that could be exploited to give commercial advantage to KPMG. However given Louise's overall role and seniority it is likely that she did have access to such information in a wider sense relating to the work of the department and Government."

The Department has recommended conditions to mitigate any perception that Dame Louise taking this job might give an unfair advantage to KPMG, which have been incorporated in the conditions set out below.

Committee's consideration

Under the Business Appointment Rules the Committee must consider whether an appointment is, or could be perceived as, a reward for decisions made while in office. It has assessed this risk as low as Dame Louise had no official dealings with KPMG or its competitors over her last two years in the Civil Service and was not involved in policy or funding decisions that may have affected it.

The Committee must also determine whether an appointment could give the employing organisation an unfair advantage over competitors by virtue of the contacts a former Civil Servant formed while in office and/ or the information they had access to. The department has noted that while Dame Louise had no access to privileged or sensitive information relating to integration policy that could be exploited to give commercial advantage to KPMG, it is likely she would have had access to wider information relating to the work of the department and Government.

While over six months have passed since Dame Louise left Government, which would reduce the potential for any information to which she had access to offer KPMG an unfair advantage, the Committee has adopted the department's suggestion that it mitigate any residual risk by imposing a condition that she should not advise KPMG or its clients on matters relating to departmental work. The Committee has made explicit that this includes providing advice on the terms of a bid or contract relating directly to the work of the department.

The Committee has also imposed a lobbying ban, which will mitigate the risk of KPMG benefiting from contacts Dame Louise gained while in office.

The Prime Minister accepted the Committee's advice that, under the Government's Business Appointment Rules, this appointment be subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the organisation to which this advice refers) privileged information available to her from her time in Crown service;
- for two years from her last day of service she should not provide advice to KPMG or its clients on matters relating to the work of the Ministry of Housing, Communities & Local Government, including the terms of bids or contracts relating directly to the work of the department; and
- for two years from her last day in service, she should not become personally involved in lobbying the UK Government on behalf of KPMG or its clients, or make use, directly or indirectly, of her contacts in Government and/or Crown service to influence policy or secure business on their behalf.

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.

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 ensure that we are informed as soon as Dame Louise takes up this position, or if it is announced that she will do so (I enclose a form for this purpose). 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, and this could lead to a false assumption being made about whether she had complied with the rules.

I should also be grateful if you would ask that Dame Louise informs us if she proposes to extend or otherwise change the nature of her role as, depending on the circumstances, it may be necessary for her to make a fresh application.

Once the 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.

Yours sincerely

Nicola Richardson
Committee Secretariat

