



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Tracey Waltho, former Director General for Housing and Planning at the Department for Levelling Up, Housing and Communities (DLUHC). Paid appointment with Citizens Advice.

1. Ms Waltho sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown servants (the Rules) on an appointment she wishes to take up with Citizens Advice as Executive Director, Strategy and Transformation. The material information taken into consideration by the Committee is set out in the annex.
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 made during Ms Waltho's time in office, alongside the information and influence a former Crown servant may offer Citizens Advice.
3. The Rules¹ set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants 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 risk presented

4. There is a relationship between Citizens Advice and government - as it receives funding and is a stakeholder on numerous policy matters. However, there is no direct overlap with Ms Waltho's commercial or policy decisions in office and the funding relationship sits with other departments. The Committee² noted Ms Waltho had no involvement in any decisions specifically affecting Citizens Advice and she did not work for a department that provided funding to the

¹ Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code.

² This application for advice was considered by Isabel Doverly; Sarah de Gay; The Rt Hon Lord Pickles; Richard Thomas; Jonathan Baume; Andrew Cumpsty; Dr Susan Liautaud and Mike Weir. Lord Larry Whitty was unavailable.

charity. Therefore it considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.

5. Ms Waltho did have responsibility for housing, planning and rough sleeping, which indirectly impacted Citizens Advice and its work. However, the department has confirmed the privileged information she had access to is now in the public domain; further she has not had access to information for seven months. These serve as mitigations to reduce the inherent risks associated with her access to information.
6. The Committee considered whether Ms Waltho's proposed contact with government in her proposed role would be proper; and determined that any contact with government to understand its interests as she described would be in keeping with the lobbying ban imposed on all former Senior Crown servants. It is relevant that there is already a stakeholder relationship between the government and Citizens Advice which advocates on social policy issues, sharing insight from its experience.

The Committee's advice

7. The Committee determined the risks identified in this application can be appropriately mitigated by the conditions below.
8. The Committee advises under the government's Business Appointment Rules that this appointment with **Citizens Advice** be subject to the following conditions:
 - She can draw on skills and experience gained from your time in office. However she must not, at any time, draw on any privileged information gained in office. Any contact with the government, directly or indirectly, must only be where it could not reasonably be perceived as lobbying on behalf of Citizens Advice's interests; and
 - She must not work or advise on any bids to secure governmental funding or contracts. She may only work on or advise on the subject matter of contracts Citizens Advice may have with the government (or related matters), provided she does not draw on any privileged information or contacts from your time in office.
9. The advice and the conditions under the government's Business Appointment Rules relate to Ms Waltho's previous roles in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. 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.
10. 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.

11. 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*'.
12. You must inform us as soon as Ms Waltho takes up employment with this organisation, or if it is announced that he will do so. 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 Ms Waltho has complied with the Rules. Please also inform 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.
13. Once the appointment 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.

Yours sincerely,

Isabella Wynn
Committee Secretariat

Annex - Material information

The role

1. Citizens Advice is a network of 316 independent charities throughout the United Kingdom that give free, confidential information and advice to assist people with money, legal, consumer and other problems.
2. Ms Waltho said she has been offered the role of Executive Director of Strategy and Transformation at Citizens Advice a new role in Citizens Advice. She said the Strategy & Transformation Directorate will bring together some existing teams and some new functions to create a new team which will deliver in 3 broad areas:
 - Strategy and performance - focused on the development and mobilisation of its service-wide strategy. This area also focuses on monitoring performance and looking for opportunities to improve impact, alongside ensuring effective governance.

- Advice strategy - brings together responsibility for considering CA's strategic position in the advice sector and delivering timely, accurate content for all advice channels.
- Transformation - a multi-disciplinary function bringing together expertise in a range of fields from service design and user experience to delivery and project and delivery management. The transformation teams design and deliver the changes needed in order to ensure that we deliver both a seamless customer journey for clients whilst also delivering business change within the national organisation.

3. In more detail, she said the role will:

- Build a new directorate to lead on strategy and transformation.
- Lead the development of the service wide strategic direction that will help deliver a renewed purpose, mobilising the energy and collective intelligence of 259 local Citizens Advice charities and the national charity.
- Reimagine what strategy looks like for a complex network of independent charities, determining what should be core and shared and what freedom should exist and be supported to maximise local impact.
- Deepen understanding of current activity and its impact.
- Partner with local Citizens Advice in achieving its purpose and the prosperity and sustainability of the whole network.
- Provide challenge and thought leadership to enable the service to respond to the changing needs of clients and the wider landscape using performance and client data to make informed decisions.
- Optimise its governance frameworks and relationships to provide the right balance of direction and leadership and assurance to support agility in decision making.
- Ensure a relentless focus on strategy monitoring and performance.
- Horizon scan and develop a strong internal and external network to enable the national organisation to think ahead and plan for future developments.
- Support the articulation and optimisation of the required service model of the future.
- Build and shape how transformation happens, enabling the right test and learn approaches and identifying scalable change across the network.
- Ensure that Citizens Advice as a whole has the insight, capability and capacity needed to adapt to changing needs and demands on the service.
- Help to architect the organisation development and transformational change required across the service.
- Provide visible leadership, contributing to the collective brand and visibility of the Executive Team.

4. Ms Waltho said Citizens Advice has a long-standing relationship with government and receives a core grant from BEIS. The national organisation receives funding from several government departments, principally BEIS, DWP, MOJ and the Welsh Government. Ms Waltho said she has only worked at DWP during her time in government and this was over 5 years ago and she never had responsibility for any of these funding streams whilst in government. She said the charity also advocates on social policy issues, bringing insights from the experience of those who come to Citizens Advice for help. As Executive Director for Strategy and Transformation she said she will be

responsible for shaping strategy and supporting Citizens Advice to fulfil its purpose. The role involves facing out across the Citizens Advice network of 259 local Citizens Advice charities.

5. Ms Waltho said she would expect the role to involve some contact with government in order to understand the government's priorities and the associated implications for the Citizens Advice strategy and advice content. She confirmed policy/advocacy work and bidding for government funding does not sit within her remit; these areas are covered by two separate Executive Director Roles; and she wished to be explicit that she will have no reason to interact with government on influencing housing policy and is *'...fully mindful of the requirement not to use confidential information for the benefit of the charity or to lobby on its behalf within two years of leaving my role, and will ensure that I adhere to this in my dealings with government'*.
6. Ms Waltho informed the Committee she has been on leave from government since 4 March 2022- she was on leave for family health reasons and had completely no involvement in her work during this period.

Dealings in office

7. Ms Waltho stated she had had no direct contact. She said some members of her team engaged with Citizens Advice to understand its data - for example on the position of renters during Covid (one of several data sources that informed government's monitoring of the position).
8. She said policy and regulatory changes that she has worked on affect people using housing services who may (or may not be) clients of Citizens Advice , rather than Citizens Advice directly.
9. Ms Waltho said her housing policy knowledge is already 7 months out of date, and the key areas that she worked on are now in the public domain via the Social Housing White Paper, Levelling Up White Paper, Levelling Up Bill and Renters Reform consultation.

Department Assessment

10. The DLUHC confirmed the details Ms Waltho provided.
11. The DLUHC said it has a mutual interest with Citizens Advice in ensuring that tenants receive good quality advice and are able to enforce their rights. Occasionally, Citizens Advice will share data with the Department which benefits its understanding of key issues. However, there is no contractual or regulatory relationship.
12. The department stated she does not have any privileged information which is commercially valuable or sensitive which would impact Citizens Advice or other bidders for government funding. The department confirmed policy work she has been involved with as DG Housing and Planning is now in the public domain and therefore no longer privileged. This includes the Social Housing White

Paper, Levelling Up White Paper, Levelling Up Bill and Renters Reform Consultation. The department also confirmed she has been on a period of extended leave since March 2022, which further mitigates this risk. The only specific areas of policy knowledge which are relevant to Citizens Advice would be around Renters Reform and Planning Reform - this is now in the public domain and the information she has is outdated due to the time which has elapsed since she was operating in this role.

13. The department recommended the standard conditions.