



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

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**BUSINESS APPOINTMENT APPLICATION: Mr Jamie Hope, former Director of Policy with the Prime Minister's Policy Unit at No.10 and former Special Adviser (Policy) at the Foreign, Commonwealth and Development Office. Paid application to join Hakluyt & Company (Hakluyt).**

1. Mr Hope 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 taking up a role with Hakluyt as an Executive.
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during Mr Hope's time in office, alongside the information and influence he may offer Hakluyt. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. The Rules set out that Crown servants must abide by the Committee's advice<sup>1</sup>. 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 risks presented

5. Mr Hope did not meet with Hakluyt nor make any decisions specific to the company during his time as a Special Adviser for government. Therefore, the Committee considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.

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<sup>1</sup> 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

6. Given Mr Hope's former role at No.10, he will have had access to general sensitive information that could benefit many organisations, including Hakluyt. The Committee considered a number of mitigation in this case:
- Mr Hope was only in No.10 for 49 days, during a retroactively transient administration, after which there were subsequent changes in administration and policy, thus degrading the currency of the information he may possess;
  - It has been 7 months since his time at No.10;
  - It has been 11 months since his time at the Foreign, Commonwealth and Development Office (FCDO);
  - The FCDO did not have any objections to the appointment; and
  - The Cabinet Office does not have concerns regarding his access to sensitive information.
7. The Committee<sup>2</sup> also considered there is a risk it could be perceived that Mr Hope's network and influence might assist Hakluyt unfairly in regard to providing access to government.
8. There are also risks related to Hakluyt's unknown clients - should Mr Hope advise clients he had contact with during government, or if he were to advise on matters he had involvement in whilst in government would raise risks under the Rules.
9. Hakluyt said it will ensure compliance with the Rules:  
*'There will be no need for him to interact with the UK government in carrying out his work for us, but [Hakluyt] will of course fully respect any requirements that ACOBA imposes on his employment....'*

#### The Committee's advice

10. To address the risk associated with Hakluyt's unknown clients, the Committee considered it necessary to impose a further condition. This makes it clear that in working with the company, Mr Hope should not advise on work with regard to any policy he had specific material involvement in or responsibility for in his time as Director of Policy with the Prime Minister's Policy Unit at No.10 & as Special Adviser at the Foreign, Commonwealth and Development Office.
11. The Committee considered the other risks associated with his privileged access to information, contacts and influence gained in Crown service are sufficiently mitigated by the other conditions below. In coming to that decision, it was significant that Hakluyt considered compliance with the Committee's advice.

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<sup>2</sup> This application for advice was considered by Andrew Cumpsty; The Rt Hon Baroness Jones of Whitchurch; The Rt Hon Lord Pickles; Richard Thomas; and Mike Weir. Jonathan Baume, Sarah de Gay and Isabel Doverty were unavailable.

12. The Committee's advice, under the Government's Business Appointment Rules, that this appointment with **Hakluyt & Company** should be subject to the following conditions:

- he should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time in Crown service;
- for two years from his last day in Crown service, he should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of Hakluyt & Company (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage Hakluyt & Company (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service, he should not provide advice to Hakluyt & Company (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the UK government or any of its arm's length bodies; and
- for two years from his last day in Crown service he should not advise Hakluyt & Company or its clients on any work with regard to any policy he had specific involvement in or responsibility for as Director of Policy with the Prime Minister's Policy Unit & as Special Adviser at the Foreign, Commonwealth and Development Office, nor where he had a relationship with the relevant business during his time as Director of Policy with the Prime Minister's Policy Unit & as Special Adviser at the Foreign, Commonwealth and Development Office.

13. The advice and the conditions under the government's Business Appointment Rules relate to an applicant'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 he may be subject to in parallel with this Committee's advice.

14. 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.

15. 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.'*

16. Please inform us as soon as Mr Hope takes up employment with this organisation. Please also inform us if he proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him 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 where appropriate, refer to it in the relevant annual report.

Yours sincerely

Hamzah Rizvi  
**Committee Secretariat**

## **Annex - Material Information**

### The role

1. Mr Hope said it is an advisory services company and said it advises decision-makers on the opportunities and risks facing their businesses. Hakluyt described the company as:

*'...a strategic advisory firm that was established in 1995. We support corporate leaders and investors on the opportunities and risks facing their businesses. Our clients include around 40% of the world's largest 100 companies by market capitalisation. We also work with over three quarters of the top 20 private equity firms in the world by assets under management, and many of the most respected sovereign wealth and pension funds'.*

2. Mr Hope stated he wishes to take up a paid, full-time role with Hakluyt as an Executive. He stated that the day-to-day responsibilities of the role entails analysing research, producing written reports and advising clients directly on a range of topics and sectors. The role is based in Dubai, United Arab Emirates. He stated his role will not involve contact with government.

3. Hakluyt confirmed that:

*'Hakluyt does not work for the UK government and does not lobby politicians, officials or others on behalf of our clients. Jamie's role will be to advise commercial clients in a range of industry sectors. He will be based in Dubai, and will primarily work with clients in the Middle East. There will be no need for him to interact with the UK government in carrying out his work for us, but we will of course fully respect any requirements that ACOBA imposes on his employment with us'.*

### Dealings in office

4. Mr Hope advised the Committee that he did not meet with, make decisions specific to Hakluyt. He also stated he does not have access to any sensitive information specific to the company.

#### Departmental Assessment

5. The Cabinet Office confirmed the details Mr Hope provided and stated that he did not meet with, make any decisions specific to Hakluyt, also confirming there is no departmental relationship with Hakluyt.
6. The Cabinet Office further stated that:
  - *‘Given the seniority of the applicant’s [Mr Hope] official role, he would have seen a wide range of information whilst in post that may or may not be relevant to the company, and wider industry. However, over 7 months has passed since his time in [government] and the policy landscape has changed significantly’*
  - *‘...There is always some risk of the perception of a former senior official of No 10 joining an organisation and bringing knowledge of the inner workings of government. However, the currency of this knowledge is likely significantly diminished considering that the government has changed since the applicant has left government. Furthermore, as former special advisers are often sought after due to their performance in high-profile roles, this prospective role is likely to be seen as a consequence of their expertise rather than any reward’.*
7. The FCDO & the Cabinet Office did not have any concerns with the appointment and recommended the standard conditions applied on Mr Hope’s role.