



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Mr William Tanner, former Director of the Policy Unit and Deputy Chief of Staff to the Prime Minister, No.10 Downing Street. Paid appointment with Hakluyt & Company.

1. Mr Tanner sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Crown Servants (the Rules) on taking up a role with Hakluyt & Company (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 Tanner'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 advice¹. 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

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

5. Mr Tanner did not meet with Hakluyt nor did he make any decisions specific to the company during his time in government. Therefore, the Committee² considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
6. Given Mr Tanner'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 mitigating factors in this case:
 - It has been 6 months and there has been a change of government administration and general policy direction since Mr Tanner's time in government - providing a gap between his access to information and him taking up this appointment.
 - The Cabinet Office did not consider Mr Tanner possesses any particularly sensitive information that may confer an unfair advantage to Hakluyt.
 - This is a return to Mr Tanner's previous work in policy, communications and consulting, before joining government.
7. The Committee considered there are risks associated with Mr Tanner's influence and network of contacts in government. It is significant that Hakluyt has confirmed it will abide by the Committee's advice, including that Mr Tanner's role will involve no lobbying work. Hakluyt's clients are unknown and Mr Tanner may be asked to advise clients in his role. This raises the unknown risk that he could advise on matters that conflict with his time in office.

The Committee's advice

8. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that Mr Tanner cannot make use of privileged information, contacts or influence gained from his time in Crown service to the unfair advantage of Hakluyt. Alongside the standard conditions, to mitigate the risk associated with him advising unknown clients, the Committee has imposed a restriction which makes it clear that Mr Tanner should not advise on work that arises where it relates to matters he had a specific role in developing or determining during his time at No.10 Downing Street.
9. The Committee gave weight to the employer's confirmation of adherence to this advice and the conditions therein.

² This application for advice was considered by Andrew Cumpsty; Hedley Finn OBE; Sarah de Gay; Isabel Doverty; The Baroness Thornton; The Rt Hon Lord Pickles; Michael Prescott; and Mike Weir. Dawid Konotey-Ahulu CBE DL was unavailable.

10. The Committee's advice in accordance with the government's Business Appointment Rules is that this role with **Hakluyt & Company** be subject to the below 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 the Policy Unit and Deputy Chief of Staff at No.10 Downing Street nor where he had a relationship with the relevant client during his time in his roles.

11. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's previous role 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 Standards³. 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.

12. 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

³ All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers

also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Ministerial Code/Civil Service Code or otherwise.

13. 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.*"
14. Mr Tanner must inform us as soon as he takes up this work or if it is announced that he will do so. Similarly, he must inform us if he proposes to extend or otherwise change his role with the organisation as depending on the circumstances, it might be necessary for him to seek fresh advice.
15. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Yours sincerely

Hamzah Rizvi
Committee Secretariat

Annex - Material Information

The role

1. According to its website, Hakluyt is an advisory services company and said it advises decision-makers on the opportunities and risks facing their businesses.
2. Hakluyt has previously described itself to ACOBA 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”.
3. In his paid, full-time role as Executive, Mr Tanner states that the day-to-day responsibilities of the role would involve analysing research, producing written reports, and advising clients directly on a range of topics and sectors. He stated role would be similar to the work he was involved in prior to his work for HMG:
“I would be returning to a similar form of work to that I performed prior to entering No10 in November 2022, first as Chief Policy Adviser at Portland Communications between 2017-18, where I advised corporate clients on all manners of policy, and then as Director of the thinktank Onward from 2018-2022, where I led several programmes of research and ran a successful business network for corporate supporters.”
4. Mr Tanner states that Hakluyt does not lobby politicians, officials or arms-length bodies and does not work directly for the UK government and therefore he will have no direct contact with his previous department. He confirmed his role will not involve contact with or lobbying of government.
5. Hakluyt provided confirmation that:
 - It does not work with the UK government;
 - does not lobby politicians, officials or others on behalf of its clients;
 - Mr Tanner’s role will not involve lobbying or contact with government;
 - It will abide by the conditions imposed on Mr Tanner’s role.

Dealings in office

6. Mr Tanner confirmed he was not involved in any policy, commercial or regulatory decisions, nor did he meet with or have access to sensitive information specific to Hakluyt during his time in service.

Departmental assessment

7. The Cabinet Office confirmed the details provided by Mr Tanner, stating:
 - He was not involved in any policy or regulatory decisions specific to Hakluyt.
 - He did not meet with the company during his time in service, nor does the department have a relationship with the company.
 - He would have been exposed to a range of information that may or may not be relevant to Hakluyt and its clients.
 - The currency of any knowledge held by Mr Tanner is likely significantly diminished considering that the government changed following the General Election. It also noted the privileged information ban as mitigation of the risks relating to any information he may possess from his time in government service.
 - It flagged no commercial decisions he was involved in, noting that Special Advisers are not permitted to make commercial/procurement decisions in office. As Hakluyt's clients are not known, it is uncertain whether the applicant has had any official dealings with them, or if any have bid for contracts from UK government departments or received public funds.
 - In 2023 Hakluyt was contracted by the Labour Party to increase their engagement.
8. The Cabinet Office recommended the standard conditions.