



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

May 2025

BUSINESS APPOINTMENT APPLICATION: Amanda Reynolds, former Director General, Strategy and Transformation at the Department for Work and Pensions. Paid appointment with Accenture (UK) Limited.

1. Ms Reynolds 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 Accenture (UK) Limited (Accenture) as a Managing Director.
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 Ms Reynolds' time in office, alongside the information and influence she may offer Accenture. 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. Accenture is a global multinational professional services company that specialises in information technology services and management consulting. Accenture has several ongoing contracts across UK government departments and agencies, including the Department for Work and Pensions (DWP) – Ms Reynolds’ department.
6. Though DWP has several high spend contracts within Accenture, none of these fell under Ms Reynolds’ responsibilities. Ms Reynolds’ only contact with Accenture was incidental, for example, speaking at a large event on changing customer expectations. Ms Reynolds made no decisions, commercial or otherwise, specific to Accenture or its work with DWP. The Committee² therefore considered that the risk Ms Reynolds could reasonably be considered to have been offered this role as a reward for decisions made, or actions taken, in government service is low.
7. Ms Reynolds is a member of DWP’s Executive Team and her role has been focussed on transformation and strategy, including in DWP’s Transformation Team, the Business Strategy Team, and the department’s Outcome and Delivery Plan³. Therefore, Ms Reynolds may have had access to a range of sensitive information in relation to DWP’s general operations, which could give rise to a risk she offers unfair insight to Accenture on, for example, possible upcoming changes and transformation projects. The Committee agreed with DWP that this risk is limited for the following reasons:
 - Ms Reynolds was responsible for delivering strategy and transformation projects agreed elsewhere in the department. Her knowledge and insight of the future direction of DWP strategy, and therefore its operations, are limited to high level principles.
 - the details and deliverables of current transformation programmes have been in the public domain since January 2025⁴.
 - her roles have been independent from commercial information related to Accenture, which was handled by other officials at DWP.
 - she has not been privy to the funding arrangements or final outcomes of DWP’s delivery plan, which are yet to be finalised following the Spending Review⁵.
 - DWP does not consider her to possess sensitive information that may confer an unfair advantage

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

³ committees.parliament.uk/publications/40123/documents/195656/default

⁴ assets.publishing.service.gov.uk/media/6787e156bca9366c9f56df78/DWP_Government_Major_Projects_Portfolio_AR_Data_March_2024.csv/preview

⁵ The Spending Review 2025, which concludes in June 2025, sets spending plans for at least the next three years, with the UK government aiming to align spending with priorities, promote efficiency, and ensure fiscal sustainability.

8. While limited, there is a risk she might be seen to offer some insight specifically on DWP related projects. Ms Reynolds and Accenture confirmed that in this role she will have no involvement in work with DWP.
9. This appointment will include contact with government, as Ms Reynolds seeks to take on a client lead role with His Majesty's Revenue and Customs (HMRC). This involves management of work activity under a current contract – ensuring operational delivery of the programme of work. This is specific to its NPS Solutions contract⁶ in the tax area. It was significant to the Committee's consideration that Ms Reynolds has had no privileged insight into the specific HMRC policy or commercial policy/decisions here and had no responsibility or involvement in anything that relates to tax or the NPS contract. As such there is no overlap with Ms Reynolds' time in government. It is also relevant that this work is a long standing programme of work between Accenture and HMRC.
10. There are inherent risks associated with Ms Reynolds' contacts and influence gained from her time in office. In the circumstances as set out above, the Committee agrees with DWP that the risk of undue influence is limited. It is significant that Accenture confirmed that Ms Reynolds will have no involvement in the commercial relationship between Accenture and the government.
11. The Committee also considered it significant that prior to joining government in 2021, Ms Reynolds' background was in delivering transformational change and consulting work for a range of companies – including Accenture.

The Committee's advice

12. There is an inherent risk associated with former officials working on government contracts. In this case, the limited nature of this work described by Ms Reynolds does not raise any propriety issues under Rules – because there is no overlap with her responsibilities at DWP or her access to information in office.
13. The Committee considered that, despite the mitigations above, given the commercial interest Accenture has with DWP, there is a risk she might be perceived to offer insight on future DWP opportunities. Therefore, the Committee advice is that she must not advise Accenture on any DWP related matters.
14. The remaining risks identified are appropriately mitigated by the conditions below. These seek to prevent Ms Reynolds from making improper use of her privileged access to information, contacts and influence from her time in office.

⁶ https://www.find-tender.service.gov.uk/Notice/041469-2024#complementary_info-heading

15. It is significant that Accenture confirmed its adherence with the Committee's advice, as noted in the annex below.

16. In the circumstances, the Committee's advice under the government's Business Appointment Rules is that this appointment with **Accenture (UK) Limited** should be made subject to the following conditions:

- she should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time in Crown service;
- for two years from her last day in Crown service, she should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of Accenture (UK) Limited (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage Accenture (UK) Limited (including parent companies, subsidiaries, partners and clients);
- for two years from her last day in Crown service, she can draw on her skills and experience to advise Accenture on the subject matter of the NPS Solutions contract with His Majesty's Revenue and Customs Service, provided she does not draw on any privileged information or contacts from her time in government service. She should not undertake any work with Accenture (UK) Limited (including parent companies, partner companies and subsidiaries) that involves advising on the terms of bids to secure government funding/contracts; and
- for two years from her last day in Crown service, she must not advise Accenture (UK) Limited (including parent companies, partner companies and subsidiaries) on matters related to the Department for Work and Pensions.

17. 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 from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests⁷. It is an applicant's personal

⁷ 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.

responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.

18. 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 Ministerial Code/Civil Service Code or otherwise.
19. 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.'*
20. Ms Reynolds must inform us as soon as she takes up this work or if it is announced that she will do so. Similarly, she must inform us if she proposes to extend or otherwise change her role with the organisation as depending on the circumstances, it might be necessary for her to seek fresh advice.
21. 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. Accenture is a global multinational professional services company that specialises in information technology services and management consulting. Accenture has several ongoing contracts across UK government departments and agencies.
2. Ms Reynolds stated that her proposed full-time role as Managing Director will include:
 - leading Customer Service Transformation

- development of thought leadership pertaining to the Health & Public Service Group
 - horizon planning
 - financial performance
 - customer satisfaction
 - taking a client lead role with HMRC in the Tax area, solely on its NPS Solutions contract⁸ – which Ms Reynolds described as management of existing work activity under the current contract and ensuring operational delivery of the programme of work.
3. Accenture has a long-standing contract with HMRC to manage and maintain the National Insurance and PAYE Service (NPS), a critical system for UK tax administration. The contract has recently been extended with an increase for additional modernisation. According to information provided on the publicly available contract award notice, a change of supplier is not feasible for technical reasons, as NPS has extremely high levels of technical and functional complexity. The award notice states that Accenture has managed these services for many years and has in-depth knowledge of the applications and business services. It was determined as part of the contracting process that a change of supplier would put key services at serious risk and therefore was not considered viable.
 4. Ms Reynolds stated she will not be involved in lobbying the UK government, nor in advising Accenture on how to represent its interests, commercial or otherwise, to government.
 5. Prior to joining government in 2021, Ms Reynolds' background was in delivering transformational change, as:
 - Global Partnership Director, Centrica
 - Executive Customer Experience Director, Affinity Water
 - Head of Customer Channels, Nationwide Building Society
 - Head of Transformation, Santander.
 6. Also, Ms Reynolds previously worked at Accenture in 2014-2015. She ran her own independent consultancy AOB Consultancy Ltd in 2007-2009 and again from May 2020 to February 2021, when she joined DWP.
 7. Ms Reynolds applied for this role via an advertised recruitment process.

Correspondence with Accenture

8. Accenture confirmed in writing its understanding of, and agreement to comply

⁸ https://www.find-tender.service.gov.uk/Notice/041469-2024#complementary_info-heading

with, the Committee's advice that:

- a. Ms Reynolds cannot contribute to discussions about bids or negotiations, nor direct conversations that would help secure work with government on Accenture's behalf.
- b. Ms Reynolds is prevented from providing advice on Accenture's behalf regarding procurement matters with government.

Dealings in office

9. Ms Reynolds stated she was not involved in policy, regulatory or commercial decisions, nor involvement in grants/contracts for Accenture or its consultancy competitors which contract with DWP (as set out below).
10. Ms Reynolds had general interactions with Accenture, including: attending a meeting hosted by the company on global thought leadership on future trends across all sectors; speaking at an Accenture event alongside organisations from all sectors on changing customer expectations in early 2024; and visiting the Accenture office in Newcastle in 2024 alongside other DWP officials to meet new DWP apprentices to share her career journey.
11. She described her interactions with Accenture's competitors, noting that she had no involvement in the contractual dealings with the companies, though in some cases her team did:

KPMG

- she attended meetings with her team on progress updates and a presentation on completion of the consultancy work
- she attended two events, one in 2023 and one in 2024, with DWP colleagues to listen to actors sharing good and bad practice customer experiences
- she attended a workshop event with the DWP Executive Team on its work with DWP's commercial team on the department's approach to outsourcing work.

Deloitte

- she was Executive Sponsor from January 2023 to June 2023 for a Deloitte-led data programme – as above, she was not involved in commercial discussions/decisions but was involved in the performance of the work
- her team worked on a Request for Proposal and Invitation to Tender at the Executive Committee's request – Deloitte's was the sole response to the Request for Proposal; the work and commercial conversations were then led by one of her Directors and she joined regular progress updates with her team and Deloitte.

PwC

- from the beginning of January 2025, a PwC employee joined her team on secondment as Strategy Director, initially reporting to a peer Director General then, following the new organisation design, to Ms Reynolds – she had one meeting in January 2025 with PwC regarding a potential 6-month extension to the secondee’s contract, and had no conversations with the secondee on PwC matters.

12. Ms Reynolds stated she has limited access to sensitive information that may provide an unfair advantage to Accenture. Following the outcome and decisions made as a result of the upcoming Spending Review, any information she may possess on matters noted below will quickly become out of date. Additionally, she told the Committee:

- the DWP Outcome Delivery Plan is in development to be published in April/May 2025 – she has only had sight of performance headings for the current period, and is not sighted on projected outcomes following April 2025.
- DWP Business Strategy – the high level principles and departmental plan, which is currently in development alongside the DWP story, are due to be published in April/May 2025.
- she was responsible for the DWP Transformation team from November 2024, though she is not the Executive Sponsor for the team, nor does she manage the Senior Responsible Officer for DWP’s Transformation programmes. The accountability for DWP’s Transformation programmes sits elsewhere. The current DWP Transformation programme has been in the public domain since 16 January 2025⁹ – detailing:
 - each transformation programme, as well as its RAG (Red, Amber, Green) status.
 - the full scope of the work.
 - the financial information, annual budget and forecast.
 - the performance of each programme.
 - project schedule .
- the DWP Strategy 2030 is currently high level principles at this stage, without a roadmap with deliverables and a detailed scope. The strategy was signed off by other DWP officials and ministers in October 2024.

13. Ms Reynolds stated all transformation programmes will be updated and changed by the relevant Director General, Executive Sponsors and Senior Responsible Officers for the next Programme Business Case, to be submitted after April 2025.

Departmental assessment

14. DWP confirmed the details provided by Ms Reynolds including that she has no involvement in DWP's contracts with Accenture.

15. DWP stated that it has a number of contracts with Accenture. The department stated that for 2024-2025, its spend with Accenture was c£40million which falls within DWP's High spend category, including:

- CAMLite Legacy Agent Facing System Support
- SCE Augmented Resources for CCAMS
- Next Generation Cloud Platforms Proof of Concept
- DSP ENG – Retirement, Bereavement & Care and Appeals & Supporting Capabilities Service Lines
- DSP UCD and Del Man Resource RB&C – Appeals & Supporting Capabilities Service Lines
- Project Manager for Change of Circumstances Service
- Provision of AME Payments – Strategic Product Development
- The Garage – Delivery Factory and Live Service Teams
- Provision of Digital Specialist Resources for DWP Digital Services – Children & Families Function
- PTP CAM.

16. DWP confirmed Ms Reynolds was not involved in decisions specific to Accenture or its consultancy firm competitors and her dealing, as described, were focused on the delivery/performance of contracts already held with DWP. The previously agreed contracts were not within her area of responsibility.

17. DWP did not consider Ms Reynolds' access to information would offer an unfair advantage to Accenture. The department stated:

- her insight into the Business Strategy team's work is limited to the high level principles, due to be shared with that department. It said there is no suggestion that the high level strategy presents any significant risk of unfair advantage.
- as a member of the DWP Executive Team, Ms Reynolds is aware of high level principles for the department's future vision and the Outcome Delivery Plan – but she is not responsible for the Outcome Delivery Plan or the finalisation of its strategy. Further, this will be impacted by the outcome of the Spending Review.
- DWP's commercial arrangements are managed through its Commercial Team under strict governance procedures. As such, commercially

sensitive information is not shared wider than within the Commercial Team. Ms Reynolds has had no access to this information.

18. DWP is aware Ms Reynolds' proposed role in Accenture is specifically working with HMRC on the operational delivery of the NPS Solutions contract. The department's view is that this poses no risk from a DWP/wider government perspective. It confirmed Ms Reynolds has no specific knowledge from her role within DWP that would provide the company with an unfair advantage.
19. DWP did not have concerns with the appointment and recommended the standard conditions be applied.