

*From the Chair*



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

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**BUSINESS APPOINTMENT APPLICATION: Robert Largan, former Government Whip in the House of Commons. Paid appointment with Deloitte LLP.**

1. You approached the Advisory Committee on Business Appointments the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as a Senior Manager, Client Relationship Executive, with Deloitte LLP (Deloitte).
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 taken during your time in office, alongside the information and influence you may offer Deloitte. 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 Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, 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. Deloitte is a multinational professional services firm. It provides services in audit, tax, legal, financial advisory, risk advisory, and consulting. It operates across all sectors. As a Client Relationship Executive, you said that you will

be providing support on all client relationships and services exclusively within the Financial Services, Clients & Markets team, and will be dealing with private individuals/organisations on these matters.

6. You did not meet with Deloitte while in office, nor did you make any decisions that were specific to the company. The Committee<sup>1</sup> considered the risk that you were offered this role as a reward for decisions made or actions taken in office was low.
7. As a former minister, there are inherent risks associated with your access to privileged information and knowledge. However, there is no direct overlap with your role in government, and the Cabinet Office confirmed that you did not have any access to information that could grant Deloitte an unfair advantage. In addition, it has been 11 months since you left office and last had access to information. There remains a risk here, albeit limited, as Deloitte's clients are unknown; and you could be asked to advise on matters that overlap with your time in office.
8. There are risks related to your privileged contacts gained in government which could offer Deloitte unfair access and influence. This includes any contacts gained in ministerial office, but external to the UK government, if used to gain new business for Deloitte. The Committee recognised this risk is limited given your ministerial role as a whip was focused on parliamentary business.
9. The Committee considered it relevant that you worked at Deloitte as a chartered accountant between 2012 and 2017, before entering government.

#### The Committee's advice

10. The Committee determined that the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of your access to privileged information, contacts or influence gained from your time in government service to the unfair advantage of Deloitte, including not using any contacts you gained in external organisations or foreign governments for business development purposes.
11. In addition, as is usual in such cases, the Committee has imposed a further condition to mitigate the risks associated with unknown clients. This makes clear that in working with Deloitte you should not advise on work which overlaps with any matters in which you made a material role in government,

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<sup>1</sup> This application for advice was considered by Isabel Doverty; Sarah de Gay; Hedley Finn OBE; Michael Prescott; and The Baroness Thornton. Dawid Konotey-Ahulu CBE DL was unavailable.

should that risk arise. Deloitte has confirmed that it will adhere to the conditions set out in this advice letter, and that your role will not involve any lobbying.

12. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Deloitte LLP** be subject to the following conditions:

- you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in ministerial office;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of Deloitte LLP (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Deloitte LLP (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office you should not undertake any work with Deloitte LLP (including parent companies, subsidiaries, partners and clients) that involves providing advice 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 its arm's length bodies;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you developed during your time in office in other governments and organisations for the purpose of securing business for Deloitte LLP; and
- for two years from your last day in ministerial office, you should not advise Deloitte LLP or its clients on any work with regard to any policy which you had a material role in developing or determining as Government Whip in the House of Commons, or where you had a relationship with the company or organisation during your time in this role.

13. The advice and the conditions under the government's Business Appointment Rules relate to your 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' Interests.<sup>2</sup> 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.

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 Ministerial Code or otherwise.
15. The Business Appointment Rules explain that the restriction on lobbying means that you '*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. You must inform us as soon as you take up employment with Deloitte, or if it is announced that you will do so. Please also inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.
17. Once the appointment(s) 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.

**Isabel Doverty**  
Interim Chair  
ACOPA

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<sup>2</sup> 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.

## **Annex - Material Information**

### The role

1. Deloitte LLP is a multinational professional services network, based in London. It is one of the big 4 accounting firms. Deloitte provides professional services: audit, consulting, financial advisory, risk advisory, tax, and legal services, internationally. It works across all sectors – private and public. Services include: driving large-scale, complex transformation programmes; supporting innovative delivery models, digital transformation and leadership and talent development; and specialist financial and commercial advice on major procurements and complex transactions. It is a supplier to government, and its contracts can be found on the Crown Commercial Service website.<sup>3</sup> Deloitte does not provide lobbying services for clients or facilitate their interactions with government.
2. You propose to take on a paid, full-time role with Deloitte as a Senior Manager, Client Relationship Executive on the Financial Services, Clients & Markets team. You said that your role would be as follows:
  - a. Providing support to the Lead Client Service Partner on all client relationships and services, with a focus on financial services for private individuals/organisations.
  - b. No contact with central government or the whips office.
3. You previously worked for Deloitte between 2012-2017, before entering government, as a chartered accountant - a qualification that you retain.

### Correspondence with Deloitte

4. Deloitte has provided the following information in reference to this appointment:
  - a. it will ensure adherence to the conditions set out in this letter;
  - b. your role will not involve advising on, or participating in, bids for public sector contracts, engagement with government or providing political or policy advice to clients;
  - c. it has processes in place with regard to taking on clients and independent procedures to avoid and decline work which might involve lobbying. It will ensure that you are familiar with these processes.

### Dealings in office

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<sup>3</sup> <https://www.crowncommercial.gov.uk/suppliers/335/deloitte-llp>

5. You advised the Committee that you did not meet with Deloitte whilst in office, nor did you make any policy, regulatory or commercial decisions specific to the company. You also said that you did not have access to any sensitive information.

#### Departmental Assessment

6. The Cabinet Office confirmed the details you provided and recommended the standard conditions.