



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

Room G/8, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)

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

5 February 2021

Dear Mr Harrington

Thank you for your response to our enquiries into the circumstances around you taking up a role with APCO Worldwide. We are very sorry to hear about the death of your mother and your own illness in March.

You informed the Committee you completed the forms as instructed on the ACOBA website in relation to your role with APCO Worldwide; and having heard nothing from the Committee you considered there was no problem.

The Government's Business Appointment Rules state that you must not take up or announce an appointment without seeking and receiving the Committee's advice. Your appointment to APCO Worldwide was announced on 18 May 2020 on their website.

We have thoroughly searched all records and there is no record or reference to this application or your work with APCO Worldwide on our systems. We recognise you have offered evidence that you downloaded the relevant forms and tried to send in an application in February 2020. However, we can find no record of an email from you about this role on our system. Had you contacted the Committee again to check on progress with your application and the Committee's advice, this would have been picked up. You have apologised for not chasing up and for not waiting for the Committee's advice before taking up the role in May 2020.

It is a breach of the Government's Rules, and the requirement set out in the Ministerial Code<sup>1</sup>, to fail to seek advice. It is also a breach of those Rules to take up a position without first receiving advice. It is not open to applicants to assume, in the absence of any communication, that they may proceed to take up a role.

The Committee's advice is always published if and when a role is taken up, so that any restrictions or conditions that are considered necessary are made public.

In line with our policy of transparency, we will be publishing our exchange of correspondence about this matter in due course.

The Advisory Committee on Business Appointments<sup>2</sup>

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<sup>1</sup> The Government's Business Appointment Rules apply by virtue of the Ministerial Code, which states (in paragraph 7.25) that Ministers must 'seek advice from the independent Advisory Committee on Business Appointments (ACoBA) about any appointments or employment [my emphasis] they wish to take up within two years of leaving office. Former Ministers must ensure that no new appointments are announced, or taken up, before the Committee has been able to provide its advice

<sup>2</sup> The Rt Hon Lord Pickles, Chair of the Committee, has recused himself from this matter.

## Annex - Previous correspondence on this matter



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26 January 2021

Dear Mr Harrington

I am writing to you in my capacity as head of the Secretariat for the Advisory Committee on Business Appointments<sup>3</sup> (the Committee). It has been brought to our attention, through a media enquiry you are now working with APCO worldwide, as confirmed on its website<sup>4</sup>.

You have not sought the advice of the Committee on this role, which you are required to do on any appointments or employment you seek to take up within two years of leaving office.

The Government's Business Appointment Rules exist to protect the integrity of government. The Rules also state retrospective applications will not normally be accepted, and no new appointments should be announced, or taken up, before the Committee has been able to provide its advice.

I am writing to understand the circumstances behind your failure to seek advice; and provide you with an opportunity to tell us about any steps you have taken to ensure the probity in this appointment given your previous role as a government minister.

In line with our policy of transparency, we will be publishing our correspondence in due course. I would be grateful for a reply to this letter before Monday 1 February 2020, your correspondence or any failure to respond will be included in our publication.

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<sup>3</sup> The Rt Hon Lord Pickles, Chair of the Committee, has recused himself from this matter.

<sup>4</sup> <https://apcoworldwide.com/people/richard-harrington/>

I would also take this opportunity to remind you to seek advice for any new appointment or employment you plan to take up within two years of leaving office, as set out above.

Yours sincerely

Cat Marshall  
**Committee Secretariat**

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**Email dated 27 January 2021 from Mr Harrington**

Dear Cat,

Thank you for your email, which I was shocked to receive.

When I left Parliament, I read the ACOBA rules thoroughly. I have tried to adhere to them and the ministerial code, as my reputation is paramount to me, both professionally and personally.

In February of 2020, I was offered 2 part time positions, one a consultancy with a hotel company, (which actually wasn't progressed), and the other consultancy with APCO worldwide. In both cases, I went online and completed the forms as instructed on the ACOBA website.

I didn't hear anything from ACOBA, but spoke to other former MPs in a similar position, who also confirmed that they had uploaded information when this arose. In March 2020, my mother died, and I had Covid shortly afterwards. After this, I assumed that as no issues had been raised with me, it was in order for me to proceed with my part time consultancy, as I assumed that you would only get back to me if there was a problem.

For the record, this role does not involve contact with Ministers, or anything else that could breach the rules.

If I have been remiss in my adherence to the procedure, I apologise, but I had every reason to believe I had acted correctly. If it had crossed my mind that I was breaking the rules, I would not have gone ahead.

I hope this clarifies matters and that this can be resolved without public attention which would be very damaging to my reputation.

Please do not hesitate to contact me if I can be of further assistance.

Yours sincerely,

Richard

Richard Harrington

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**Email dated 2 February 2021 from Mr Harrington**

Dear Cat

I found it!

It was 21st February 2020

Thanks for your patience.

I did apply but didn't wait for an answer. I apologise for that. Covid and my mother's death are not an excuse, but I forgot about it, and didn't chase for a response. I believed what I was doing complied with the Ministerial Code, so I wasn't concerned. I hope that helps and the committee will accept my apology for not chasing up.

Kind Regards

Richard

From: Richard Harrington <rharrington@msn.com>

Sent: 21 February 2020 16:05

To: acoba@acoba.gov.uk <acoba@acoba.gov.uk>

Subject: Please find attached information about a new consultancy

Sent from my iPhone

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