



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Lord Richard Harrington, former Minister for Refugees jointly in the Department for Levelling Up, Housing and Communities (DLUHC) and the Home Office. Paid appointment with Intelligent FS Ltd.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former ministers (the Rules) on an appointment you wish to take up with Intelligent FS Ltd as Chairman. The material information taken into consideration by the Committee is set out in the annex below.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during your time in office, alongside the information and influence a former minister may offer Intelligent FS Ltd.
3. 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 risk presented

4. There is no relationship between Intelligent FS Ltd and government, and you did not meet with the company whilst in office. The Committee¹ considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
5. This appointment has no specific overlap with your last ministerial role, and

¹ This application for advice was considered by Jonathan Baume; Isabel Doverty; Andrew Cumpsty; Sarah de Gay; Susan Liautaud; Richard Thomas; and Mike Weir. Lord Larry Whitty was unavailable. This letter contains the Committee's advice, arrived at without my input and which I am sending in my capacity as Chair of the Committee.

neither DLUHC or the Home Office considered your access to information raised any particular concerns here. As a former minister, the Committee noted there is a broad risk you will have had access to a wide range of information which may provide an unfair advantage.

6. As with all applications, there is a risk associated with your influence and network of contacts within government.

The Committee's advice

7. The Committee determined the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear you cannot make use of information or influence gained from your time in ministerial office to the unfair advantage of your employer.
8. The Committee advises, under the government's Business Appointment Rules, that your appointment with **Intelligent FS Ltd** 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 Intelligent FS Ltd (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial office to influence policy, secure business/funding or otherwise unfairly advantage Intelligent FS Ltd (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office, you should not undertake any work with Intelligent FS Ltd (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.
9. The advice and the conditions under the government's Business Appointment Rules relate to your 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 your personal responsibility to understand any other rules and regulations you may be subject to in parallel with this Committee's advice.
10. 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.

11. 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*'.
12. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so, and we will publish this letter on our website. Any failure to do so may lead to a false assumption being made about whether you had complied with the Rules. You must 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.
13. 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.

The Rt Hon Lord Pickles

Annex - Material information

The role

1. You said Intelligent FS Ltd is a construction company. The website states it offers a range of construction services across the UK, including to the luxury residential sector from initial survey, design and delivery as an integrated solution. Its clients include G4S, DAM Healthcare, hVIVO, BAM FM and OneMedical.
2. You said in your paid, part-time capacity as Chairman you will help to guide the business and grow it. You said you would have no contact with government in this role.

Dealings in office

3. You advised the Committee that you did not meet with Intelligent FS Ltd whilst in office. You said you did not have any involvement in policy, regulatory or commercial decisions that would have been specific to the company.

Department Assessment

4. Both DLUHC and Home Office confirmed the details you provided. DLUHC confirmed there was no overlap between your role in government and Intelligent FS Ltd.

5. Both departments had no concerns about this appointment and recommended the standard conditions.