



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 (HO). Paid appointment with Canaccord.

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 Canaccord as a Senior Advisor. 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 Canaccord.
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. The Committee¹ noted that there is no relationship between Canaccord and your former departments, you did not meet with Canaccord during your time as a minister, and you did not make decisions specific to Canaccord during your time in office. Therefore the Committee considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
5. As a former minister, there are inherent risks associated with your network of contacts

¹ This application for advice was considered by Jonathan Baume; Isabel Doverty; Andrew Cumpsty; Sarah de Gay; Susan Liautaud; Richard Thomas; Mike Weir and Lord Larry Whitty. 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.

within government, your influence, and the perception that you have access to relevant privileged information and knowledge, which could unfairly benefit Canaccord. However, there was no specific overlap with your previous ministerial role, and neither of your former departments considered your access to information to raise any particular concern.

The Committee's advice

6. To address the risk associated with Canaccord's unknown clients, the Committee advises you should not work on policy you had specific involvement in or responsibility for as Minister for Refugees. The Committee determined the remaining inherent risks identified in this application can be appropriately mitigated by the standard conditions, as outlined below. These make it clear you cannot make use of your privileged access to contacts, information and influence gained from your time in ministerial office to the unfair advantage of your employer.
7. Taking these factors into account, in accordance with the government's Business Appointment Rules, the Committee's advice is this appointment with **Canaccord** 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 Canaccord (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 Canaccord (including parent companies, subsidiaries, partners and clients);
 - for two years from your last day in ministerial office, you should not undertake any work with Canaccord (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 Crown service, you should not advise Canaccord or its clients on work with regard to any policy you had specific involvement or responsibility for as Minister for Refugees, or where you had a relationship with the company or organisation during your time as Minister for Refugees at the Department for Levelling Up, Housing and Communities and the Home Office.
8. 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.
9. 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.

10. 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*'.
11. 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.
12. 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 Canaccord is an investment bank. Canaccord's website states that it provides services across wealth management, global capital markets, investor relations, and fund management.
2. You said in your role as Senior Advisor, you would advise Canaccord on mergers and acquisitions, as well as look to introduce new business to them. You said you would have no contact with government in this role.
3. You said that before becoming Minister for Refugees in March 2022 you held this role and Canaccord kept the position open for you to return to. According to Companies House you were previous a Director of Canaccord Genuity Wealth Limited until 1 October 2012 and Canaccord Genuity Wealth Group Limited, also until 1 October 2012.

Dealings in office

4. You advised the Committee that you did not meet with Canaccord 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

5. Both the Department for Levelling Up, Housing and Communities (DLUHC) and the Home Office (HO) confirmed the details you provided.
6. Neither DLUHC nor the Home Office (HO) raised any concerns about this appointment.

Both departments recommended the standard conditions.