



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>

October 2024

BUSINESS APPOINTMENT APPLICATION: Trudy Harrison, former Parliamentary Under Secretary of State in the Department for Environment, Food and Rural Affairs. Paid appointment with Wellbank Park, FNS Ltd.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as a Sales and Business Development Advisor for Wellbank Park, FNS Ltd (Wellbank Park).
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 your time in office, alongside the information and influence you may offer Wellbank Park as a former minister. 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. You did not make any policy, regulatory or commercial decisions specific to Wellbank Park. Therefore, the Committee¹ considered that the risk this role could reasonably be seen as a reward for your decisions in office is low.
6. There is no direct overlap between your role as Parliamentary Under Secretary of State in the Department for Environment, Food and Rural Affairs (Defra) and your proposed appointment with Wellbank Park. Defra noted that you had limited access to information about the direction of some policies and regulations relating to residential developments. It was not aware of any specific information of risk and it is significant that you have been out of office for over 11 months, and there has since been a change in government, limiting the currency of the information you had access to.
7. As a former minister, there are inherent risks that your contacts and influence across government could offer Wellbank Park an unfair advantage. Although your role is in business development, this is narrowly defined to include finding local businesses for Wellbank Park's hub and you confirmed you will have no contact with government in this role.

The Committee's advice

8. The Committee considered conditions below are sufficient to mitigate the risks related to this role. These seek to prevent you from making use of privileged information, contacts and influence gained from your recent time in ministerial office to the unfair advantage of Wellbank Park.
9. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Wellbank Park, FNS 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 any of its arm's length bodies on behalf of Wellbank Park, FNS 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

¹ This application for advice was considered by Isabel Doverty; Hedley Finn OBE ;Sarah de Gay; The Rt Hon Lord Eric Pickles; Michael Prescott; The Baroness Thornton and Mike Weir. Andrew Cumpsty and Dawid Konotey-Ahulu were unavailable.

influence policy, secure business/funding or otherwise unfairly advantage Wellbank Park, FNS Ltd (including parent companies, subsidiaries, partners and clients); and

- for two years from your last day in ministerial office, you should not provide advice to or on behalf of Wellbank Park, FNS Ltd (including parent companies, subsidiaries, partners and clients) 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 any of its arm's length bodies.
10. 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' Interests². 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.
 11. 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.
 12. 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."*
 13. You must inform us as soon as you take up employment with this organisation(s), 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.

² 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.

14. 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 that Wellbank Park is a commercial limited company operating in a variety of sectors focussed on sustainability. The directors David Nuttall and Mark Frost own Wellbank Park which is a 12.5 acre former Ministry of Defence site. You helped planning permission between 2006 – and 2017 in both paid and unpaid roles, including working for the local council and FNS Ltd.
2. You wish to take up a part-time, paid role as a Sale and Business Development Adviser for Wellbank Park. You said that whilst you were the local MP between February 2017 and May 2024, Wellbank continued to progress and now requires a salesperson to sell plots to prospective buyers and help to secure businesses for the Hub, which includes a swimming pool, changing rooms, café and bistro. You said that your role will not involve contact with government. Responsibilities will include:
 - Meeting plot buyers to explain the process and choosing plot designs for the buyers' homes
 - Explaining to prospective buyers what is on offer in the local area, in particular local hikes and bike rides
 - Providing administrative services to FNS Ltd
 - Advising FNS Ltd on the business strategy for commercial aspects of the build
3. The payment vehicle for your work on Wellbank Park is through an existing Limited Company (Slate Tops Ltd) which you and your husband set up in September 2019.

Dealings in office

4. You said that Defra does not have a departmental relationship with Wellbank Park, nor did you make any policy, regulatory or commercial decisions specific to Wellbank Park. You said that you did not meet with the company whilst in office in your capacity as a minister.

Departmental assessment

5. Defra confirmed the details in your application, saying that you made no decisions specific to Wellbank Park, nor did you meet with the company in office.
6. The department said that whilst you had limited access to information relating to policy and regulation directions about residential developments, this was not specific to Wellbank Park. It also noted there has also been a change in government since your time in office.
7. The department recommended the standard conditions.