

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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

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 Senior Advisor for Fusion Media.
2. The purpose of the Rules is to protect the integrity of the government. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee considered whether this appointment was unsuitable given Fusion Media carries out lobbying activities; and your role is in public affairs. The Committee also considered the information provided by the department about your access to information and decision making in office, alongside the information provided by Fusion Media about how it will separate your work from any influence of the UK government.
4. 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.
5. 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

6. Fusion Media is a global marketing and PR company operating in a variety of sectors including sustainability and transport, specialising in active travel – walking, cycling and wheeling.
7. You did not make any policy, regulatory or commercial decisions that specifically affected Fusion Media as Parliamentary Under Secretary of State at the Department for Environment, Food & Rural Affairs (Defra). As a former Minister of State for the Department for Transport (DfT) you were the minister responsible for policy decisions related to active travel - none of which were specific to this company. The Committee considered it unreasonable to suggest any such decisions were likely to have been influenced in anticipation of an offer of work with a related communications firm over two years later. Therefore, the Committee¹ considered that the risk that this role could reasonably be seen as a reward for your decisions in office is low.
8. There is no particular overlap between your most recent responsibilities in ministerial office, and your proposed role with Fusion Media. Although you supported farmers to create more access routes, Defra said that it was not aware of any particular information that you had access to that would offer Fusion Media an unfair advantage. It has been over 11 months since you last had access to information as a minister, limiting the currency of the limited relevant information you have access to.
9. As a former Minister of State for the Department for Transport (DfT) you were the minister responsible for policy decisions related to Active Travel England, a government body which aims to increase the journeys made by walking, wheeling and cycling.
10. Any information you have access to during your time as a minister at DfT is mitigated given your work creating Active Travel England and the promotion of active travel has now been published in the 'Gear Change' document² and 'Transport Decarbonisation Plan'³; much of the information that you would have had access to is now in the public domain or has changed in direction; and it has been over 2 years since your role at DfT, creating a substantial gap

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

² <https://assets.publishing.service.gov.uk/media/5f1f59458fa8f53d39c0def9/gear-change-a-bold-vision-for-cycling-and-walking.pdf>

³ <https://assets.publishing.service.gov.uk/media/610d63ffe90e0706d92fa282/decarbonising-transport-a-better-greener-britain.pdf>

between your access to information and this work.

11. There are risks associated with your influence and network of contacts gained whilst in ministerial office. In particular, your role with Fusion Media is based in public affairs and the company seeks to influence policy on behalf of its clients. You noted you will not lobby government on behalf of Fusion Media or its clients, and this will not form part of your role. To do so would be contrary to the lobbying ban that applies to all former ministers on leaving office. It is significant that Fusion Media has confirmed your role will be separated from its lobbying activity.
12. Given that Fusion Media's clients, and the precise pieces of work that you will undertake with Fusion Media are unknown, there is a risk related to a potential overlap with your time in office. You could be asked to advise on matters or organisations you were materially involved with as a minister.
13. In your role in building relationships with clients, partners and industry networks on behalf of Fusion Media, may seek to draw on contacts in the private sector only gained as a result of your role as a minister. The Committee also recognised your passion for cycling and your work with Bikeability prior to joining government, meaning you will likely also have a network from this experience which you are free to draw upon.

The Committee's advice

14. The Committee considered the risks associated with your access to information to be limited for the reasons above. Whilst you have made it clear to the Committee that you will not lobby, the main risk here is that you will be perceived to offer Fusion Media unfair access to government, especially as the company has an interest in the direction of government policies and is known to have lobbied government. Therefore, the Committee's advice is that you should have no direct engagement with the government on behalf of Fusion Media. This would not prevent you from attending events or meeting with government, if it is at government's request.
15. Separately, Fusion Media confirmed there will be no lobbying of the government in this role, in line with the expectations set out in the Rules and the conditions below.
16. To address the risk associated with Fusion Media's unknown clients, the Committee has imposed a further condition as is standard in such cases. This makes it clear, you should not advise on work with regard to any policy you had material involvement in or responsibility for in your recent time as Parliamentary

Under Secretary of State at the Department for Environment, Food & Rural Affairs.

17. The remaining conditions below mitigate the remaining risks, seeking to prevent you from making improper use of privileged information, contacts and your influence to the company's unfair advantage.

18. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **Fusion Media** 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 Fusion Media (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 Fusion Media (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to on behalf of Fusion Media (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;
- 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 Fusion Media;
- for two years since your last day in office, you should not advise Fusion Media or its clients on any work with regard to any policy decisions which you had a material role in developing or determining, or where you had a relationship with the relevant client during your time as Parliamentary Under Secretary of State at the Department for Environment, Food & Rural Affairs; and
- for two years from your last day in ministerial office you should not have any engagement on behalf of Fusion Media (including parent companies, subsidiaries, partners and clients) with the UK government.

19. 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' Interests⁴. 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.
20. 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.
21. 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.*"
22. 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.
23. 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

⁴ 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.

1. Fusion Media is a global marketing and PR firm operating in a variety of sectors focussed on marketing sustainability and transport, specialising in active travel – walking, cycling and wheeling. Fusion media has a range of clients in the active travel sector, including Brompton Bikes, GRX and RedBull. Fusion Media is listed on the Office of the Registrar of Consultant Lobbyists⁵ and its website says that it will lobby policy makers to campaign for change.
2. You wish to take up a part-time, paid role as a Senior Advisor for Fusion Media. You said that your responsibilities will include:
 - public affairs and comms focused on cycling and active travel;
 - providing advice on business strategy related to active travel, transport, and environmental issues;
 - guiding Fusion Media and its clients in navigating complex political landscapes and legislative processes;
 - public affairs leadership including attendance at press events, high profile events and policy briefings;
 - building relationships with clients, partners and industry networks;
 - defining and refining Fusion Media’s public affairs strategy.
3. You said that you will not lobby government. However, as part of your job will be public affairs, you will be listening to government ministers at stakeholder events, paying attention to and understanding the likely policy changes specific to health, environment, transport and community development. This is likely to be infrequent.
4. You said you are known to be a keen walking and cycling advocate and frequently champion the benefits of being fit and active in later life on social media. Before working as an MP, you taught Bikeability. You have also written articles on the benefits of cycling. Following an article written for Conservative Home, Adam Tranter, the founder of Fusion Media, contacted you about a role in the company. Upon leaving your ministerial role, you became active on the All Parliamentary Group for Active Travel, which Adam Tranter is involved in.

Correspondence with the employer

5. The Committee contacted Fusion Media which confirmed your role will not involve lobbying government, stating:

‘...Fusion Media will comply with the conditions imposed by ACOBA and that the advice is clear to us. With regards to the specific point on lobbying, while

⁵ https://orcl.my.site.com/clr_search?consultancy=fusion+media&tab=1#search-consultants-tab

we are registered with the Registrar of Consultant Lobbyists, this is in reality just part of what we do. We regularly advise clients on strategy and communications, which we will seek Ms Harrison's support. Ms Harrison will not be involved in any lobbying discussions.'

Dealings in office

6. You said that you did not make any policy, commercial or regulatory decisions specific to Fusion Media in office; though some decisions that you made would have affected the active travel sector as a whole:
 - i. In your role at DfT, you made policy decisions and were responsible for creating Active Travel England, a government body which aims to increase the journeys made by walking, wheeling and cycling.
 - ii. You rolled out the actions stated within the Gear Change document⁶ and Transport Decarbonisation Plan⁷.
 - iii. In your most recent ministerial role at Defra, you supported farmers to create more access routes.

7. You said there is no particular relationship between Defra or DfT and Fusion Media. You said that your only contact with Fusion Media in office was indirect- in 2021 you met with Adam Tranter (founder of Fusion Media) when he worked as an adviser to Andy Street. You also sat on a panel at a Conservative Conference in 2021 when you were the Minister for Active Travel.

Departmental assessment

8. Defra said your role with Fusion Media has very little overlap with your role in office, or Defra's work in general. You did not make any decisions specific to Fusion Media, nor does the department have a relationship with the company.

9. DfT said that you did not make any decisions specific to Fusion Media whilst in office. Further, DfT said any policy knowledge you had will be significantly out of date, in the public domain, or will have taken a different direction since the change in government. The department also noted that your contacts gained in office will be significantly out of date given the lapse of two years.

10. The departments recommended standard conditions.

⁶ <https://assets.publishing.service.gov.uk/media/5f1f59458fa8f53d39c0def9/gear-change-a-bold-vision-for-cycling-and-walking.pdf>

⁷ <https://assets.publishing.service.gov.uk/media/610d63ffe90e0706d92fa282/decarbonising-transport-a-better-greener-britain.pdf>

