

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Trudy Harrison, Parliamentary Under Secretary of State in the Department for Environment, Food and Rural Affairs. Paid Appointment with Westlakes Recruit.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) seeking advice on taking up a role in market development for Westlakes Recruit.
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 Westlakes Recruit, 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 present

5. There is no particular overlap with your responsibilities at the Department for Food, Environment and Rural Affairs (Defra), ; and you did not meet with, nor did you have any involvement in decisions specific to Westlakes Recruit

during your time in office. The Committee considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.

6. As with any former minister, it is likely that you had access to a broad range of sensitive information. The risks associated with your access to information are limited because Defra is unaware of any information that could grant Westlakes Recruit an unfair advantage. Further, you have been out of office for 16 months - placing a gap between when you last had access to information and taking up this role.
7. As with any former minister, there are inherent risks associated with your contacts and influence within government and the potential for Westlakes Recruit to gain unfair access or influence as a result. You note that in your role you are likely to have some contact with the government at events. Whilst this is entirely in keeping with the Rules, you must be careful to avoid any reasonable concern you are lobbying government on Westlakes Recruit's behalf.

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/or influence gained from your time in ministerial office to the unfair advantage of Westlakes Recruit.
9. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Westlakes Recruit** 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 Westlakes Recruit (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 Westlakes Recruit (including parent companies, subsidiaries, partners and clients); and

- for two years from your last day in ministerial office, you should not provide advice to on behalf of Westlakes Recruit (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' Interests. 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.
 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. Westlakes Recruit Ltd is a recruitment, search and consultancy service to the global nuclear market. It is headquartered in Cockermouth, Cumbria and also has an office in Dubai.
2. You wish to take up a paid, part-time role in market development with Westlakes Recruit Ltd. You said your responsibilities are as follows:
 - understanding clients' programmes of work and helping to fill their resource requirements.
 - following government policy developments, attend meetings, events, speak on panels, to the media and in other public arenas. This is likely to involve contact with government ministers and officials on occasion - particularly given the overlap with government and the nuclear sector.
3. You said that the role would likely involve contact with government ministers and officials as your responsibilities include attending meetings, events, speaking on panels, to the media and in other public arenas.

Dealings in office

4. You said that you did not make any decisions specific to Westlakes Recruit Ltd in office, nor did you meet with the company.

Departmental assessment

5. Defra confirmed that you did not make any decisions specific to Westlakes Recruit Ltd. They confirmed you did not have specific contact with Westlakes Recruit Ltd and that you did not have access to privileged information regarding Westlakes Recruit Ltd.
6. Defra said there was no direct departmental relationship with Westlakes Recruit Ltd.
7. Defra did not have concerns with the appointment and recommended the standard conditions.