



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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The Rt Hon Pat McFadden MP
Chancellor of the Duchy of Lancaster and
Minister for Intergovernmental Relations

8 July 2025

Dear The Rt Hon Pat McFadden MP,

I write in my capacity as interim Chair of the Advisory Committee on Business Appointments (ACOPA) regarding multiple failures to follow the government's Business Appointment Rules (the Rules) by Lord Richard Harrington. Please find the relevant correspondence enclosed.

The Committee is independent, with a remit to consider applications received under the Rules, consider the risks and advise on the conditions that should apply.

The Business Appointment Rules (the Rules) are set by the government, with the policy owned by the Cabinet Office. The requirement for former ministers to seek and abide by ACOPA's advice is set out clearly in the Ministerial Code, including specifically that: '*...former Ministers must ensure that no new appointments are announced, or taken up, before the Committee has been able to provide its advice.*'

Lord Harrington accepted that he took up his roles with Stephenson Harwood LLP and Regal Holdco Limited prior to receiving advice from ACOPA. Failure to seek or receive advice for each of these roles is a breach of the requirement under the Ministerial Code to follow government's Rules.

The purpose of the Rules is to protect the integrity of government by considering the real and perceived risks associated with former ministers joining outside organisations. This has not been possible here. This is an unambiguous breach of the Rules – particularly considering that Lord Harrington previously was informed of a [breach of the Rules for failing to seek advice](#) in February 2021 and sought and received advice for two appointments in 2022, following a previous departure from government in 2019. The government owns both the Rules and their enforcement. It is now a matter for government to decide what the appropriate action to take is.

These breaches, alongside those of others, raise the wider issue around the general lack of understanding of the Rules and the inadequacies of the framework in which the Rules operate. As it stands, the process relies entirely on the cooperation of applicants in the absence of any sanctions or incentives to maintain compliance. This has risked undermining the integrity of the Committee and the Rules. In line with the Committee's policy of transparency, correspondence on this matter will be published on our website.

Isabel Doverty

Interim Chair

ACOBA

Copied to: The Rt Hon Nick Thomas-Symonds MP, Minister for the Cabinet Office;
Darren Tierney, Director General, Propriety and Ethics, Cabinet Office;
Lord Richard Harrington.

Enclosures:

- ACOBA's final letter to Lord Harrington (8 July 2025)
- Lord Harrington's response to ACOBA initial letter (28 April 2025)
- ACOBA's initial letter to Lord Harrington (11 April 2025)