

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 (Defra). Unpaid appointment with the Bikeability Trust.

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 an unpaid role as Chair of the Bikeability Trust (Bikeability).
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 Bikeability. The material information taken into consideration by the Committee is set out in the annex below.
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. When considering this application, the Committee¹ took into account this appointment as Chair of the Bikeability Trust is unpaid.² Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of government by considering the real and perceived risks associated with former Crown servants joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions, or take action in office, in expectation of rewards on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. Bikeability is a charitable trust that delivers safe bicycle training on behalf of the Department for Transport (DfT). It received government funding and works closely with several government departments and agencies. As Chair, you will chair board meetings and support the CEO and wider organisation. You said you would maintain the close relationship with DfT and will also attend parliamentary events to raise awareness of Bikeability and other organisations in the active travel sector.
7. As a former DfT minister, there is overlap between your responsibilities for active travel whilst at DfT and the work of Bikeability. Any risk here is limited given this was more than two years ago and having been responsible for the setting up of Active Travel England, the work you were involved in has now been implemented and is no longer sensitive. Further, there is no overlap with your most recent ministerial role at Defra, which you left over a year ago.
8. Bikeability has an interest in government policy and funding as it relates to the active travel sector and decarbonisation. Your proposed contact with government in this role is in keeping with the lobbying ban imposed on all former ministers for two years on leaving office. However, you must be careful to avoid contact that may reasonably be perceived as seeking to influence government decisions. This would not prevent others within the organisation from engaging in such activity.

The Committee's advice

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

²By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

9. The Committee considered that this appointment does not raise any particular propriety concerns under the government's Rules. The risks are appropriately mitigated by the standard conditions below, and further limited by the unpaid nature of this role. These prevent you from drawing on privileged information, contacts and influence within government to the unfair advantage of Bikeability.
10. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **Bikeability Trust** 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 Bikeability (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 the Bikeability Trust (including parent companies, subsidiaries, partners and clients) and;
 - for two years from your last day in ministerial office, you should not undertake any work with the Bikeability Trust (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.
11. 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.³ 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.
12. 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

³ 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.

also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Civil Service Code or otherwise.

13. 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.'*
14. 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.
15. 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. The Bikeability Trust (Bikeability) is a registered charity which aims to advance the education of the public and particularly amongst children on cycling. Specifically, it delivers the government's national cycle training programme of the same name - Bikeability - managing, developing and promoting the Bikeability programme on behalf of the Department for Transport (DfT). It also supports local authorities and training providers and instructors. It receives government funding (DfT) and works in hand with Active Travel England, DfT, the Department for Education and other organisations such as Transport for London and Sustrans.
2. You informed the Committee you wish to take up an unpaid, part-time role as Chair of the Board of Trustees. You said it would involve the following:
 - a. Chairing meetings of the board of trustees.
 - b. Supporting and supervising the CEO and acting as a channel of communication between board and staff.
 - c. Leading on the development of the board and ensuring its decisions are implemented.
 - d. Leading on effective governance of the Trust.
 - e. Acting as ambassador and public face of the charity in partnership with the CEO.
3. You said that there would be contact with government in this role. You said that this is likely to include attendance at parliamentary events to raise awareness and celebrate the successes of the Trust and other organisations in the active travel sector, and have dealings with key members of DfT. You said that you would not lobby government in this role.
4. You also told the Committee that you are 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, and you have written articles on the benefits of cycling.

Dealings in office

5. As to your time in ministerial office, you told the Committee the following information:
 - a. You were a minister at DfT between September 2021 and September 2022. During that time you were responsible for active travel. You made decisions in this space, including having responsibility for

creating Active Travel England, a government body which aims to increase the journeys made by walking, wheeling and cycling.

- b. You rolled out actions within the now-published 'Gear Change' document and 'Transport Decarbonisation Plan'. You championed Bikeability and the need for all children, wherever possible, to have the opportunity to learn to ride a bike or a trike that is right for them.
- c. You met with Bikeability CEO Emily Cherry and also undertook visits to see Bikeability being taught in schools in your capacity as both a DfT minister and an MP.
- d. Any information to which you had access, and any decisions you made, are now in the public domain, as over two years have passed.
- e. You did not have any interaction or engagement with Bikeability in your ministerial role at Defra.

Department Assessment

- 6. DfT and Defra both departments confirmed the details you provided and recommended the standard conditions.