



**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 Shepley Group**

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 as Business Development Group Head at Shepley Group.
2. The purpose of the Rules is to protect the integrity of the government. The Committee<sup>1</sup> has considered the risks associated with the actions and decisions taken during your time in office, alongside the information and influence you may offer Shepley Group, 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 Defra; and you did not meet with, nor did you have any involvement in decisions specific to Shepley Group during your time in office. The Committee considered the risk

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<sup>1</sup> This application for advice was considered by; Isabel Doerty; Hedley Finn OBE; The Baroness Thornton and Michael Prescott. Sarah de Gay and Dawid Konotey-Ahulu were unavailable.

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 given the lack of any direct overlap with your time in office. Defra is unaware of any information that could grant Shepley Group an unfair advantage. Further, you have now been out of office for 22 months - placing a significant 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 Shepley Group 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. This is entirely in keeping with the Rules, though you must be careful to avoid any reasonable concern that during these interactions you are lobbying government on Shepley Group's behalf. Whilst in ministerial office you may have developed contacts in other organisations, external to government, that may be seen to be useful in securing business for Shepley Group given the focus of this role on developing business and opportunities.

#### 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 Shepley Group.
9. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Shepley Group** 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 Shepley Group (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 Shepley Group (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 Shepley Group (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 Shepley Group.
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<sup>2</sup>. 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 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, 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.

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<sup>2</sup> 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, this advice will be published.

Isabel Doverty

**Interim Chair**

**ACOBA**

## **Annex - Material Information**

### The role

1. Shepley Group is a group of manufacturing and fabrication engineering companies based in West Cumbria. The Group is made up of Shepley Engineers, PPS Electrical and West Cumberland Engineering. It predominantly serves the nuclear energy sector, particularly at the Sellafield site.
2. You said that in your role as Business Development Group Head your responsibilities are as follows:
  - engage in client meetings,
  - network with colleagues in business development roles within the nuclear and manufacturing / engineering sector,
  - support the bids team, identify new opportunities for work and promote the capability of the Shepley Group.
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 Shepley Group in office, nor did you meet with the company. You said that you had no privileged information related to Shepley Group.

### Departmental assessment

5. Defra confirmed that you did not make any decisions specific to Shepley Group. They confirmed you did not have specific contact with Shepley Group and that you did not have access to privileged information regarding Shepley Group.

6. Defra said there was no departmental relationship with Shepley Group.
7. Defra recommended standard conditions.