


**From:** Conor Chapple sparkelectrical.sw@gmail.com   
**Subject:** Phillip Rycroft PwC Appointment and ACoBA Compliance  
**Date:** 14 April 2025 at 03:35  
**To:** Acoba Mailbox acoba@acoba.gov.uk

CC

**Dear Advisory Committee on Business Appointments (ACOBA),**

I am writing to raise a formal concern regarding the post-government appointments of **Dr Philip Rycroft CB**, former Permanent Secretary at DExEU and senior official at BIS and the Cabinet Office.

There appears to be **no published ACOBA advice** for either of the following roles:

1. His position on the **Public Interest Body (PIB) of PwC UK**, and
2. His concurrent or subsequent position as **Non-Executive Director at the United Kingdom Accreditation Service (UKAS)**—a body that was under his former departmental remit.

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**Key Issues:**

- Dr Rycroft **left Crown service in March 2019**.
- Archived LinkedIn records previously listed his **start date at PwC as March 2019**—the same month he left public office.
- That date was later **changed to March 2020**, which did **not remove the role from ACOBA's jurisdiction**, but appears to reduce the visible overlap. The role still falls well **within the two-year restriction period**.
- No public ACOBA advice or clearance has been located for either PwC or UKAS.
- PwC is certified by and engages regularly with **BSI (British Standards Institution)**, which is **accredited by UKAS**. Dr Rycroft's governance roles at both PwC and UKAS therefore present unresolved **conflicts of interest**, particularly under **ISO/IEC 17011 Clause 4.4.6** which requires UKAS to monitor and treat board-level impartiality risks.

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**Broader Governance Context:**

This concern is heightened by similar issues involving **Lord Harrington**, who moved from ministerial office (DLUHC, 2022) into a role at **Stephenson Harwood LLP**. ACOBA has also confirmed **no record of prior approval** for that appointment.

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**Request:**

I respectfully request that ACOBA:

1. Confirm whether **Dr Rycroft** sought or obtained approval for either appointment;
2. Investigate the circumstances and date inconsistencies around the **PwC start date**;
3. Consider whether **retrospective publication** or findings are appropriate in light of ongoing regulatory and legal consequences.

Please confirm receipt of this submission and advise if further documentation would assist.

Sincerely,

Conor



**Non Executive Director**  
**UK Accreditation Service**  
Oct 2019 – Present · 5 yrs 7 m



**Non Executive Director**  
**NATIONAL POLICE BUILDING**



**NATIONAL HOUSE BUILDING**  
Oct 2019 - Present · 5 yrs 7 m



**Independent Non-Executive**  
**PwC UK**  
Mar 2020 - Present · 5 yrs 2 m



ACOBA  
Compli...dy.pdf



**Non Executive Director**  
**NATIONAL HOUSE BUILDING COUNCIL**  
Oct 2019 - Present · 5 yrs 6 mos



**Independent Non-Executive**  
**PwC UK**  
Mar 2019 - Present · 6 yrs 1 mo



**Specialist partner**  
**Flint Global**  
Oct 2019 - Jun 2023 · 3 yrs 9 mos



**Department for Exiting the European Union**  
2 yrs 1 mo

● **Permanent Secretary**

Liked by Victoria Raffé

## Experience



**Independent Non Executive, Public Interest Body**  
**PwC UK**  
Feb 2020 - Present · 5 years 2 months



**Chair**  
**Let's Think**  
May 2022 - Present · 2 years 11 months



Chair

INBOTiQA

Feb 2020 - Present - 5 years 2 months

As part of the PIB's succession strategy, Victoria Raffé and Philip Rycroft CB were appointed as INE members in February 2020. Victoria, a former director and Executive Committee member of the Financial Conduct Authority, and Philip, formerly the Permanent Secretary for the Department for Exiting the EU, each bring significant experience and expertise. During the year, Paul Skinner CBE stepped down after serving for nine years as an INE and Samantha Barrass also stepped down as an INE. I'm grateful for the insights and contributions each made in these roles. I am also pleased to report that Sir Ian Gibson CBE and Justin King CBE extended

On 14 Mar 2025, at 02:17, Conor Chapple <[sparkedelectrical.sw@gmail.com](mailto:sparkedelectrical.sw@gmail.com)> wrote:

Dear ACoBA Team,

I am writing to formally request clarification regarding Lord Harrington's compliance with ACoBA's Business Appointment Rules following his transition to Stephenson Harwood LLP within two years of leaving ministerial office.

## 1. Background & Concerns

### Lord Harrington's Ministerial Roles & ACoBA Obligations

- Lord Harrington served as Minister of State (DLUHC) until September 2022 and previously held ministerial positions at BEIS (2017–2019), where he had direct oversight of UKAS (United Kingdom Accreditation Service).
- ACoBA guidelines state that former ministers must seek approval before taking up any appointment within two years and are prohibited from lobbying government during this period.

### Appointment at Stephenson Harwood LLP

- Lord Harrington joined Stephenson Harwood LLP in early 2024 (Evidenced in February), within the mandatory two-year clearance period.
- There is no public record indicating he sought or received ACoBA approval before accepting this role.
- Stephenson Harwood LLP was already representing UKAS during the Grenfell Inquiry (2022)
- Harrington's role at Harwood began prior to the inquiry concluding, which raises concerns over potential conflicts of interest and insider regulatory influence.

### Regulatory Influence & UKAS Governance Concerns

- Philip Rycroft has been a Non-Executive Director of UKAS since October 2019. Prior to this, he was:
  - Permanent Secretary at DExEU (2017–2019).
  - Second Permanent Secretary at (2017).
  - Head of the UK Governance Group, Cabinet Office (2015–2019).
  - The signatory of UKAS MoUs (2009–April 2017), overseeing UKAS policy during his tenure within Government/BIS.
- In July 2019, Hugh Taylor transitioned from the Department for International Trade (DIT) to UKAS.
- Now, another former BEIS/DLUBC minister (Harrington) is joining the law firm that represented UKAS during the Grenfell Inquiry and continues to deal in private matters.

- the Grenfell inquiry and continues to do so in private matters.
  - This pattern of transitions raises serious concerns over regulatory capture, impartiality in accreditation, and conflicts of interest.
- 

## 2. Formal Request for Clarification

I respectfully request ACoBA's response to the following questions:

1. Did Lord Harrington seek ACoBA approval before accepting his role at Stephenson Harwood LLP?
  2. If so, what were the conditions or restrictions placed on his appointment?
  3. If no approval was sought or granted, what enforcement actions does ACoBA intend to take regarding this potential breach of the Ministerial Code?
  4. Given the potential conflict of interest with UKAS and Oakley Capital, will ACoBA reassess Lord Harrington's appointment under post-ministerial appointment review procedures?
- 

## 3. Next Steps & Urgency

Given the **serious governance concerns** related to **ministerial post-employment safeguards**, I would appreciate a **formal response at your earliest convenience**.

Please confirm receipt of this email and provide an estimated timeline for your response.

(Further Details Can Be Provided)

Conor Chapple

<Harrington Government Posts.png><Harrington ACOBA - 2022 Last Update.png><Lords Interests February 2024.png><2017 MoU - Version 7.png><2014 MoU - Version 5.png><Rycroft 2014 MoU.png>



**From:** Acoba Mailbox [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)  
**Subject:** Re: Phillip Rycroft PwC Appointment and ACoBA Compliance  
**Date:** 14 April 2025 at 10:13  
**To:** Conor Chapple [sparkelectrical.sw@gmail.com](mailto:sparkelectrical.sw@gmail.com)

AM

Dear Mr Chapple,

By way of an update on this - as we are treating this as a request for information under the Freedom of Information Act, we will provide you with a response within 20 working days of when you submitted it.

Best,  
Emily

*The Advisory Committee on Business Appointments*  
G/08, 1 Horse Guards Road, London, SW1A 2HQ  
Tel: 0207 271 0839  
[acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)  
[www.gov.uk/acoba](http://www.gov.uk/acoba)

**ACOBA operates a hybrid working model. We are contactable via our usual phone and email channels. Email is preferred.**

We are committed to respecting your privacy and safety in collecting and processing your personal data. For further information see the ACOBA [privacy notice](#).

On Mon, 14 Apr 2025 at 03:36, Conor Chapple <[sparkelectrical.sw@gmail.com](mailto:sparkelectrical.sw@gmail.com)> wrote:

**Dear Advisory Committee on Business Appointments (ACOBA),**

I am writing to raise a formal concern regarding the post-government appointments of **Dr Philip Rycroft CB**, former Permanent Secretary at DExEU and senior official at BIS and the Cabinet Office.

There appears to be **no published ACOBA advice** for either of the following roles:

1. His position on the **Public Interest Body (PIB) of PwC UK**, and
2. His concurrent or subsequent position as **Non-Executive Director at the United Kingdom Accreditation Service (UKAS)**—a body that was under his former departmental remit.

**Key Issues:**

- Dr Rycroft **left Crown service in March 2019**.
- Archived LinkedIn records previously listed his **start date at PwC as March 2019**—the same month he left public office.
- That date was later **changed to March 2020**, which did **not remove the role from ACOBA's jurisdiction**, but appears to reduce the visible overlap. The role still falls well **within the two-year restriction period**.
- No public ACOBA advice or clearance has been located for either PwC or UKAS.
- PwC is certified by and engages regularly with **BSI (British Standards Institution)**, which is **accredited by UKAS**. Dr Rycroft's governance roles at both PwC and UKAS therefore present unresolved **conflicts of interest**, particularly under **ISO/IEC 17011 Clause 4.4.6** which requires UKAS to monitor and treat board-level impartiality risks.

**Broader Governance Context:**

This concern is heightened by similar issues involving **Lord Harrington**, who moved from ministerial office (DLUHC, 2022) into a role at **Stephenson Harwood LLP**. ACOBA has also confirmed **no record of prior approval** for that appointment.

**Request:**

I respectfully request that ACOBA:

1. Confirm whether **Dr Rycroft** sought or obtained approval for either appointment;
2. Investigate the circumstances and date inconsistencies around the **PwC start date**.

3. Consider whether **retrospective publication** or findings are appropriate in light of ongoing regulatory and legal consequences.

Please confirm receipt of this submission and advise if further documentation would assist.

Sincerely,

Conor

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I am writing to formally request clarification regarding **Lord Harrington's compliance with ACoBA's Business Appointment Rules** following his transition to **Stephenson Harwood LLP** within **two years of leaving ministerial office**.

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## 1. Background & Concerns

### Lord Harrington's Ministerial Roles & ACoBA Obligations

- Lord Harrington **served as Minister of State (DLUHC) until September 2022** and previously **held ministerial positions at BEIS (2017–2019)**, where he had direct oversight of **UKAS (United Kingdom Accreditation Service)**.
- ACoBA guidelines state that **former ministers must seek approval before taking up any appointment within two years** and are **prohibited from lobbying government during this period**.

### Appointment at Stephenson Harwood LLP

- Lord Harrington **joined Stephenson Harwood LLP in early 2024 (Evidenced in February)**, within the **mandatory two-year clearance period**.
- **There is no public record indicating he sought or received ACoBA approval** before accepting this role.
- Stephenson Harwood LLP was already **representing UKAS during the Grenfell Inquiry (2022)**
- Harrington's role at Harwood began prior to the inquiry concluding, which raises concerns over **potential conflicts of interest and insider regulatory influence**.

### Regulatory Influence & UKAS Governance Concerns

- **Philip Rycroft has been a Non-Executive Director of UKAS since October 2019**. Prior to this, he was:
  - **Permanent Secretary at DExEU (2017–2019)**.
  - **Second Permanent Secretary at (2017)**.
  - **Head of the UK Governance Group, Cabinet Office (2015–2019)**.
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I respectfully request ACoBA's response to the following questions:

1. **Did Lord Harrington seek ACoBA approval before accepting his role at Stephenson Harwood LLP?**
2. **If so, what were the conditions or restrictions placed on his appointment?**
3. **If no approval was sought or granted, what enforcement actions does ACoBA intend to take regarding this potential breach of the Ministerial Code?**
4. **Given the potential conflict of interest with UKAS and Oakley Capital, will ACoBA reassess Lord Harrington's appointment under post-ministerial appointment review procedures?**

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## 3. Next Steps & Urgency

Given the **serious governance concerns** related to **ministerial post-employment safeguards**, I would appreciate a **formal response at your earliest convenience**.

Please confirm receipt of this email and provide an estimated timeline for your response.

(Further Details Can Be Provided)

(Further Details Can Be Provided)

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**From:** Acoba Mailbox [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)  
**Subject:** Re: Phillip Rycroft PwC Appointment and ACoBA Compliance  
**Date:** 16 May 2025 at 18:02  
**To:** Conor Chapple [sparkelectrical.sw@gmail.com](mailto:sparkelectrical.sw@gmail.com)



Dear Mr Chapple,

You contacted the Advisory Committee on Business Appointments (ACoBA) under the Freedom of Information Act 2000 to request the information ACoBA hold on whether:

1. Dr Philip Rycroft CBE (former Permanent Secretary at DExEU) sought or obtained approval for appointments with:
  - a. the Public Interest Body of PwC UK
  - b. the United Kingdom Accreditation Service (UKAS), as a Non-Executive Director.
2. ACoBA will investigate inconsistencies around Dr Rycroft's start date with PwC start date, as you told ACoBA there were archived LinkedIn records previously listing his s
3. ACoBA considers 'retrospective publication or findings are appropriate in light of ongoing regulatory and legal consequences'

#### ACoBA's response

I can confirm that ACoBA does hold information relevant to your request. I have responded to the three questions raised below:

##### 1. Did Dr Rycroft receive advice?

Dr Rycroft sought and received advice from ACoBA to work with both the Public Interest Body of PwC and as a board member of UKAS.

The advice letter sent to Dr Rycroft for UKAS is published on the [ACoBA pages of gov.uk](https://assets.publishing.service.gov.uk/media/5dc16d9b40f0b637a43d1dbb/Philip_Rycroft_UKAS_Final_Advice_for_Website.pdf) and are therefore in the public domain. Therefore, pursuant to section 21(1) of the Freedom of Information Act 2000, this information is exempt because it is reasonably accessible. For ease of access, I have included the link to the advice letter here: [https://assets.publishing.service.gov.uk/media/5dc16d9b40f0b637a43d1dbb/Philip\\_Rycroft\\_UKAS\\_Final\\_Advice\\_for\\_Website.pdf](https://assets.publishing.service.gov.uk/media/5dc16d9b40f0b637a43d1dbb/Philip_Rycroft_UKAS_Final_Advice_for_Website.pdf)

##### 2. Will ACoBA investigate inconsistencies regarding Dr Rycroft's start date at PwC - which you said appear in archived LinkedIn data?

Having looked into the information held and the information available in the public domain ACoBA has found no evidence of inconsistency. Our records show that Dr Rycroft told / post after receiving final advice, though no firm date was provided. He was provided with final advice in February 2020. Publicly available records show that PwC's website records beginning in March 2020; as do the available LinkedIn pages.

##### 3. Will ACoBA consider retrospective publication or findings appropriate?

ACoBA is committed to transparency and considers it is in the public interest to make public whether or not individuals have complied with the government's Business Appointments Code. As it has come to our attention now that Dr Rycroft took up the position with PwC in March 2020 but the advice was not published, we have now updated Dr Rycroft's page on ACoBA's website. [https://assets.publishing.service.gov.uk/media/6824b6517293a87b6c75ec5c/Advice\\_letter\\_-\\_Philip\\_Rycroft\\_Independent\\_Non-Executive\\_-\\_PwC.pdf](https://assets.publishing.service.gov.uk/media/6824b6517293a87b6c75ec5c/Advice_letter_-_Philip_Rycroft_Independent_Non-Executive_-_PwC.pdf). As above, pursuant to section 21(1) of the Freedom of Information Act 2000 (the Act), this information is exempt because it is reasonably accessible. For ease of access, I have included the link to the advice letter here: [https://assets.publishing.service.gov.uk/media/5dc16d9b40f0b637a43d1dbb/Philip\\_Rycroft\\_UKAS\\_Final\\_Advice\\_for\\_Website.pdf](https://assets.publishing.service.gov.uk/media/5dc16d9b40f0b637a43d1dbb/Philip_Rycroft_UKAS_Final_Advice_for_Website.pdf)

#### Next steps

If you wish to request an internal review of this response, you can do so. You should note that ACoBA will not normally accept an application for internal review if it is received more than 30 days after the date that the reply was issued. After this time, in the interests of transparency, this response to your information request will be published on ACoBA's website with your personal information redacted. If you wish to request an internal review or you are unhappy with the service provided, you should write to:

Chief Executive  
Civil Service Commission  
Room G/08  
1 Horse Guards Road  
London  
SW1A 2HQ  
E-mail: [chief.executive@csc.gov.uk](mailto:chief.executive@csc.gov.uk)

If you are not content with the outcome of your internal review, you may apply directly to the Information Commissioner for a decision. Generally, the Commissioner cannot make a decision if you have exhausted the complaints procedure provided by ACoBA. The Information Commissioner can be contacted at:

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

Yours sincerely,  
Dominic Kelly

*The Advisory Committee on Business Appointments*  
G/08, 1 Horse Guards Road, London, SW1A 2HQ  
Tel: 0207 271 0839  
[acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)  
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