

Samantha Harrison
Via email

18 June 2026

Compliance with the Business Appointment Rules: Samantha Harrison (née Jones), former Expert Adviser at the Department of Health and Social Care and previously Expert Adviser and Interim Permanent Secretary and Chief Operating Officer at 10 Downing Street – Breach of the Rules under her Independent Consultancy

Dear Ms Harrison,

I am writing in the context of the Commission's responsibility to assess compliance with the Government's Business Appointment Rules (the Rules) in relation to civil servants at SCS Pay Band 3 and 4. This function was previously exercised by the Advisory Committee on Business Appointments (ACOPA) and transferred to the Civil Service Commission in October 2025.

The purpose of the Rules is to protect the integrity of government. To ensure this aim is met, ACOPA required that advice be sought for all commissions under an applicant's independent consultancy, and that no such work be taken up before final advice was issued.

We recently became aware of a potential breach of the Rules in relation to work that you carried out with Carnall Farrar late in the 2023/24 financial year under your [independent consultancy](#), for which you received final advice on 30 August 2023. Whilst reviewing this, you also requested the Commission examine other cases in which you thought there might potentially have been a breach of the Rules. In reviewing each of these cases we found:

1. Carnall Farrar: You applied for advice and received a provisional advice letter from ACOPA on 7 February 2024, but you completed five days of consultancy work without receiving final advice. Work was undertaken before the formal process was completed. You confirmed that you followed all of the conditions contained in the provisional advice and no further work was undertaken.
2. Newmarket: You did not seek advice from ACOPA before undertaking work in September 2023. Whilst you subsequently submitted an application in October 2023 to the Department of Health and Social Care, ACOPA received the application in January 2024 and you received final advice in February 2024, the initial work took place without prior approval. You confirmed that no further work was undertaken.

3. Huma: You completed multiple days of work between August and December 2023 without making an application to ACOBA. You confirmed that no further work was undertaken.
4. System C: You served on the advisory board between mid to late 2023 without making an application to ACOBA.

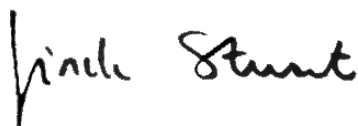
Applicants have a personal responsibility to understand and comply with the Rules. In taking up work with Carnall Farrar before the process was completed and in undertaking work with Huma, System C, and Newmarket without seeking prior advice, you did not follow the explicit conditions of your consultancy approval.

The actions set out above constitute a breach of the Rules. The Commission has recorded this as one consolidated breach in relation to the management of new work through your independent consultancy.

I want to put on record that you have engaged with the Commission constructively and transparently throughout this process, and indeed proactively brought several of these historic matters to our attention in your letter of 12 June 2026. You told me that you followed the conditions referenced in the provisional advice in your work with Carnall Farrar, and that you followed the Rules in the other roles set out above. There is no evidence to suggest this is not the case. You have explained that these omissions were accidental oversights on your part during a period when you had a number of applications in the process concurrently, and that you did not knowingly contravene the Rules.

The Commission's policy is to make breaches of the Rules public. Accordingly, this correspondence will be published on the Commission's website. I am also copying this letter to the Director of Propriety and Ethics in the Cabinet Office.

Yours sincerely,



Gisela Stuart
First Civil Service Commissioner