

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

Room G/08, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

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BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: The Rt Hon Sajid Javid MP, former Secretary of State for Health and Social Care (DHSC). Unpaid appointment with Saïd Business School, Oxford University.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the Government's Business Appointments Rules for Former Ministers (the Rules) on an unpaid role you want to take up with Saïd Business School, Oxford University. The material information taken into consideration by the Committee is set out in the annex.
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 Saïd Business School, Oxford University.
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 advice

5. When considering this application, the Committee¹ took into account that this appointment as Visiting Fellow is unpaid². 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 the Government by considering the real and perceived risks associated with former ministers 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. The department confirmed you have no access to sensitive information and the Committee noted you have been out of ministerial office for over a year. The unpaid nature of this appointment limits the real and perceived risk of you making improper use of information or contact you had access to while in office for your personal benefit.

The Committee's advice

7. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. Whilst there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below, preventing you from drawing on your privileged information and using your contacts to the unfair advantage of your new employer, will sufficiently mitigate this case.
8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **Saïd Business School, Oxford University** 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 arms' length bodies on behalf of Saïd Business School, Oxford University (including parent

¹ This application for advice was considered by Andrew Cumpsty; Jonathan Baume; Isabel Doverty; Sarah de Gay; The Rt Hon Lord Eric Pickles; Richard Thomas and Mike Weir.

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.

companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Saïd Business School, Oxford University (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 Saïd Business School, Oxford University (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 arms' length bodies.
9. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards/House of Lords Commissioners for Standards. It is an individual's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.
 10. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so and we will publish this letter on our website. Any failure to do so may lead to a false assumption being made about whether you had complied with the Rules.
 11. You must 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.
 12. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Annex - Material information

The role

1. You seek to take up an unpaid, part-time role (7-10 days per year) with Saïd Business School, Oxford University, as a Visiting Fellow - having been nominated for the role by The Director of the Oxford University Centre for Corporate Reputation.

2. As a Visiting Fellow, you stated you will be teaching students and speaking at the university as well as helping with research, especially into the relationship between public policy and business. You stated you will not have any contact with government as part of your role.

Dealings in office

3. You advised the Committee that you did not make any policy or regulatory decisions specific to Saïd Business School, nor did you meet them whilst in office.
4. You stated DHSC may have had dealing with the scientific research departments of Oxford University, as it does with other universities.

Departmental Assessment

5. DHSC confirmed the details you provided and confirmed it does have a departmental relationship and holds contracts with Oxford University, the vast majority of which are for scientific research. DHSC stated:
 - you did not make any decisions specific to, nor met with Saïd Business School during your time in office; and
 - you do not have any access to sensitive information specific to the Saïd Business School.
6. DHSC did not have any concerns with the appointment and recommended the standard conditions.