



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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Rt Hon David Willetts MP
House of Commons
London
SW1A 0AA

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Ref: 1415/13M

Dear Mr Willetts,

Business Appointment Applications

You asked for the Committee's advice about accepting the following appointments:

- Education Investment Advisor with the Silvertown Partnership;
- Member of Higher Education (HE) Strategic Management Board with Times Education Supplements (TES)

When considering your applications, the Committee took into account that you did have official dealings with your prospective employers during your last two years in office, but this was in the normal course of business as part of your ministerial responsibilities.

The Committee noted that the Silvertown Partnership is an organisation which specialises in the regeneration of towns. Your role would involve identifying and approaching universities that would be interested in setting up a site or a research centre for a major redevelopment plan in Docklands. If the Partnership runs a competition for the site and/or creates a multi-institution campus, you will take part in designing and advising the Partnership on a suitable model. You will also advise it on the terms of a contract so that the educational institution(s) are committed to providing a substantial investment in return for using the site.

The Committee noted that universities receive indirect funding from BIS via the Higher Education Funding Council for England and Research Councils, but the department operates on an arms-length basis with educational institutions and BIS ministers do not determine specific institutional allocations. You did not take part in the allocation of funds for specific universities during your time in office.

Furthermore, the Committee took into account that your role with the Silvertown Partnership would be as an advisor on the overall competition, and your role would not

involve making decisions on specific universities – those decisions would be solely for the Board of the Silvertown Partnership. The Committee also took into account that your former Department sees no conflict of interest or reputational risk in relation to you taking up this appointment.

The Committee noted that TES publishes global rankings of universities. Your role would be to provide advice on how best to expand these assessments and to have a presence at meetings abroad where these rankings are presented and discussed. The Committee noted that you would not be involved in specific decisions on the rankings of individual universities and the focus of your work would be global rather than on the UK.

The Committee noted that you did have official dealings with TES during your time in office, as you dealt with journalists from Times Higher when they reported on British higher education issues. However, you were not involved in their international activities or corporate strategy. The Committee further noted that there is not a contractual/non contractual relationship between TES and BIS, nor did you have any official dealings with competitors of TES whilst in office.

Taking into account all the circumstances, the Committee is content to approve the appointments subject to the following conditions:

- that you should not draw on any privileged information available to you as a Minister; and
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK Government on behalf of your new employer, its parent company or its clients.

It might be helpful if I add that lobbying is defined in the Business Appointment Rules in the following way: “Lobbying in this context means that the former Minister should not engage in communication with Government - including Ministers, special advisers and officials - with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted”.

I should be grateful if you would inform us as soon as you take up the appointment, or if it is announced that you will do so, either by returning the enclosed form or by emailing the office at the above address. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments which have not been taken up or announced. This could lead to a false assumption being made about whether you had complied with the Ministerial Code. Similarly, I should be grateful if you would inform us if you propose to extend or otherwise change your role with the Times Education Supplements or the Silvertown Partnership, as depending on the circumstances, it may be necessary for you to seek fresh advice.

Once the appointments have been publicly announced or taken up, we will publish this letter on the Committee’s website and include the main details of the application, together with the Advisory Committee’s advice, in the regularly updated consolidated list on our website and in the next annual report.

Sir Hugh Stevenson