



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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You asked for the Committee's advice about taking up an unpaid appointment with the Department of Science, Technology, Engineering and Public Policy at University College London.

The Committee's remit

As you will be aware, it is the Committee's role to advise on any conditions that should apply to appointments or employment under the Government's Business Appointments Rules for Former Ministers (the Rules), which apply to former Ministers for two years after they leave office.

The Rules seek to counter suspicion that:

- a) the decisions and statements of a serving Minister might be influenced by the hope or expectation of future employment with a particular firm or organisation; or
- b) an employer could make improper use of official information to which a former Minister has had access; or
- c) there may be cause for concern about the appointment in some other particular respect.

When the Committee considers applications it must have in mind that Government has judged that it is in the public interest that former Ministers with experience in Government should be able to move into business or into other areas of public life, and to be able to start a new career or resume a former one. It is equally important that when a former Minister takes up a particular appointment or employment, there should be no cause for any suspicion of impropriety.

Appointment details

You wish to take up an appointment as an Honorary Professor at the Department of Science Technology, Engineering and Public Policy (STePP) at University College London (UCL). You noted this would be an unpaid and part-time role with a time commitment of eight days per year.

You describe the role as likely to include duties such as: lectures; seminars; tuition; and participation in the research activities of STEaPP, specifically around STEaPP's Informed Public Decision-Making research group; and its Master of Public Administration qualifications on: science; innovation; development; technology and innovation policy; and digital technologies and public policy. You said you do not expect to have contact with Government in this role.

You told the Committee you had no previous official dealings with STEaPP at UCL or any kind of competitor; that you are not aware of any direct relationship STEaPP has with the Department for Health and Social Care (DHSC); and that you have no relevant commercially sensitive information. You added that as Chair of the Science and Technology Select Committee, you had frequent engagement with universities and science in public policy specialists. You also said that many of the individuals involved in this field at UCL, and other universities, gave oral or written evidence to the Select Committee on more than one occasion.

The Permanent Secretary at your former Department, DHSC was consulted on this application. DHSC confirmed you attended some meetings at UCL: three alongside the Secretary of State and a Member of the UCL faculty staff in March and April 2017, which covered discussions on international comparisons and mental health; and you met twice with UCL hospital.

The Department told the Committee there are a number of funding arrangements with UCL, UCL Hospitals NHS Foundation Trust (and related partnerships), mostly through the National Institute for Health Research (NIHR). NIHR is funded by the Department and its Board includes departmental staff. DHSC also confirmed that it works with UCL, via the Office of Life Sciences, on life sciences policy. The funding arrangements include:

- NIHR investment in research infrastructure via UCL Hospitals NHS Foundation Trust (the Trust); some in partnership with UCL.
- The Trust currently receives £6,500,000 of NIHR funding for the NIHR Clinical Research Facility over 5 years from April 2017.
- The Trust was awarded NIHR Biomedical Research Centre designation for the third time, in partnership with UCL, with funding of £111,503,317 over 5 years from 1 April 2017.
- The NIHR Great Ormond Street Hospital Biomedical Research Centre supports medical research for children and young people in partnership with the UCL Institute of Child Health. The GOSH NHS Foundation Trust was awarded £37,005,790 over 5 years from 1 April 2017.
- The Reviews Facility EPPI Centre at UCL receives £1 million per year from DHSC, awarded in 1995 before you were in ministerial office.
- The Mental Health Policy Research Unit, managed by academics at UCL and King's College London (and partners with others) was awarded in 2017 - £5 million in NIHR funding over 5 years.
- The Obesity Policy Research Unit, hosted by the UCL Great Ormond Street Institute of Child Health was awarded £5 million over 5 years in 2017 from DHSC.

DHSC confirmed funding decisions which took place whilst you were in office (namely for the Mental Health Policy Research Unit and the Obesity Policy Research Unit) were made by officials on recommendation from independent panels. It confirmed that as responsible

Minister, you would have been informed of the final outcome of the competitions, but would not have been involved in negotiating terms and conditions.

The Department said you would have had access to information about the NIHR, however this would no longer be sensitive, given the passage of time. It told the Committee it has no concerns about you taking up this role.

The Committee's consideration

The Committee¹ noted that this role is related to your time in office as Parliamentary Under Secretary of State for Public Health and Innovation. As is to be expected, there are links between your former department and UCL and its research partners. The Department also confirmed you met with UCL and UCL Hospital whilst in office. The Committee took into account that this is an unpaid role involving part-time work in teaching and research activities; the Department has confirmed that relevant funding decisions were not made by you, rather decisions were made by officials on the basis of recommendations from independent panels; and DHSC has no concerns about you taking up this role. The Committee therefore considered the risk you made decisions whilst in office in expectation of this role is low.

DHSC confirmed you had access to some sensitive data but that given the time passed since you left ministerial office, it is no longer sensitive. The Committee considered the conditions imposed below adequately mitigate any risk you could offer UCL an unfair advantage as a result of your time in office.

Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises this appointment be subject to the following conditions:

- that you should not draw on (disclose or use for the benefit of yourself or the organisations to which this advice refers) any privileged information available to you from your time in ministerial office; 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 the University College London or its partners; nor should you make use, directly or indirectly, of your contacts in Government to influence policy or secure funding on behalf of the University College London or its partners.

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.

The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/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*

¹ This application for advice was reached by Sir Alex Allan; Jonathan Baume; Lord Michael German; Baroness Helen Liddell; Richard Thomas and John Wood.

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."

I should be grateful if you would inform us as soon as you take up this role, 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 that have not been taken up or announced. This could lead to a false assumption being made about whether you had complied with the Rules and the Ministerial Code.

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.

Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate where appropriate, refer to it in the relevant annual report.

The Baroness Browning

Mrs Nicola Blackwood-Bate