



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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1. You approached the Committee about taking up appointments as Chair of Public Policy Projects (PPP).

The Committee's role and remit

2. As you will be aware, it is the Committee's role to advise on the 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.

3. 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.

4. It is not the Committee's role to pass judgment on whether an appointment is appropriate or suitable in any other regard.

The Application

5. You sought the Committee's advice on taking up a position as Chair with Public Policy Projects. This is a paid, part time appointment, involving 36 days of work per year.

6. PPP is a think tank. On its website, it states it '*is a policy advisory and development organisation in the health, care and local government sectors*'. It provides services that enable others to gain information on the sector, such as news feeds aggregation locally, regionally and globally, as well as providing a database of relevant knowledge.

7. You stated your role will include primarily chairing and presenting events and providing some support/participation in the research activities into public policy matters covering health, science and technology, infrastructure and local government undertaken by the executive members of the think tank. You confirmed that you will not lobby the Government on behalf of PPP, advise or be party to any bids or contracts with Government and will not disclose proprietary information.

8. You informed the Committee you had no official contact with PPP, however did meet with a number of think tanks during your time in office. You did not state any relevant policy development or decisions made in relation to PPP and are unaware of any contractual relationship between the Department for Health and Social Care (DHSC) and PPP. You also informed the Committee that you are re-entering into a sector that you have previous experience in, having had prior frequent engagement with health regulation, science, technology and public policy specialists in the below roles:

- Chair of Science and Technology Select Committee (2015-16)
- Chair of the Human Tissue Authority (2018-19)
- Board Member at Oxford University Innovations (2018-19)
- Honorary Professor of Science, Technology and Public Policy at UCL (2018 - Present)

9. Your former department, DHSC was contacted about this application. It stated it had no concerns with you taking up this appointment and noted:

- you were officially invited to attend PPP's event on two occasions as primary guest speaker, which was delegated to officials to attend;
 - You met, spoke with, intended to meet or attended the below think tank competitors:
 - Policy Exchange, Reform – Baroness Blackwood attended a Secretary of State 'Investing in our NHS Speech' event at Policy Exchange 8-10 Great George Street SW1P 3AE
 - Institute for Public Policy Research – No meetings
 - The Nuffield Trust - Meeting with Baroness Blackwood and Nigel Edwards (Chief Executive, Nuffield Trust) on the 3rd September 2019 to discuss digital technologies
 - Centre for Health and the Public Interest (CHPI) – No meetings
- you acquired no commercially sensitive information on competitors that would provide PPP with an unfair advantage;
- DHSC does not have a commercial relationship with PPP and you made no decisions that would have impacted PPP or their competitors.

The Committee's consideration

10. The Committee noted you are re-entering into a sector/industry you previously worked in, prior to becoming an Under Secretary of State. Although you were invited as guest speaker to PPP's events, you were unable to attend, additionally, you gained this invitation and met with PPP's competitors as part of carrying out the usual duties of your role with stakeholders. You and your former department confirmed you made no decisions benefiting the think tank or its competitors and the department has no contractual relationship with PPP. As such, the Committee considered the risk you were offered the role as a reward for decisions made in post as low.

11. The Committee noted that DHSC did not consider you had access to any relevant privileged information. The Committee determined any inherent risk here is mitigated by the ban on the use of privileged information from your time in Ministerial office.

12. Additionally, the Committee noted that you would have had access to a wide range of contacts across Whitehall and within the Government. In line with your assurances that the role will not involve lobbying the Government, the Committee would draw your attention to the lobbying ban below which makes it clear that you may not make use of your contacts gained in office to the unfair advantage of PPP.

13. You have stated that you do not seek to advise on bids or grants for PPP, and to mitigate any risk here the Committee has prohibited you from doing so in your role with the think tank.

14. In the circumstances, the Committee's advice is that, under the Government's Business Appointment Rules, this appointment with Public Policy Projects 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 on behalf of Public Policy Projects (including parent 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 Public Policy Projects (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 Public Policy Projects (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.

15. 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.

16. 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 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.*"

17. The Committee also notes that in addition to the conditions imposed on this appointment, there are separate rules in place with regard to your role in the House of Lords.

18. 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.

19. 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.

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

The Rt Hon Lord Pickles

The Baroness Blackwood