



George Freeman MP
Member of Parliament for Mid Norfolk

The Secretary
Office of the Advisory Committee on Business Appointments
G/o8. Ground Floor
1 Horse Guards Road
London
SW1A2HQ

Nov 2020

Dear Sir,

I'm writing following my correspondence with your office in April, to seek clarification on an issue regarding whether or not I need to register a short piece of work (2 days) I did this summer for a small medical device company with which I have no ongoing role, and which has no link whatsoever to my previous role in Government (as Minister of State at the Dept of Transport), but to my professional career before becoming an MP.

Having been elected in 2010 in the wake of the MPs expenses scandal I take the whole issue of transparency of MPs expenses and earnings very seriously and have always tried to make sure I set the highest standard (above and beyond the minimum compliance requirements).

That was why in April I contacted ACOBA to ask for advice on whether or not I needed to register pro-bono work for the Government helping with the call for help from industry as part of the Covid public health emergency, which I envisaged might possibly lead to commercial work downstream.

I understood from the advice that I did not have to register this work – only an ongoing paid commercial role if that transpired.

Following my pro-bono work with the company in question (Aerosol Shield Ltd – a husband and wife team of medics developing novel protective equipment for frontline medical staff) and their unsuccessful application to be considered as 'PPE', the founders decided to try and raise commercial seed funding and asked for my help and if successful for me to join them as Chairman of their new start-up. I downloaded the ACOBA registration form and completed it with a view to registering – but after a very short piece of work for the Founders we decided not to pursue this and to part ways. I invoiced for 27hrs work – properly registered in the Register of Interests – and didn't think I needed to complete the registration given there was no ongoing role.

I have set out below the full background. Please could you consider and advise me whether or not – in the circumstances - I should have registered.

As I understand it the ACOBA registration system is designed to ensure that there can be no risk of the reasonable suspicion of any conflict of interest or impropriety in the conduct of an

MPs work in Parliament and in meetings with Ministers arising from any outside interests linked to their previous Ministerial role.

Given the circumstances - that my work for Aerosol Shield was not in any way linked to my previous Ministerial role at the Dept for Transport, but my previous professional career as a Life Science business adviser; that it was four years since my Life Science role in Government, and that I had not had any contact with Ministers or officials, or meetings or speeches in Parliament on anything related to Aerosol Shield, it didn't even occur to me that there might be a need to register with ACOBA.

I never sought to conceal the work - I registered the work and income in the Register of Interests to ensure it is in the public domain. (Unfortunately due to a clerical error in my office it was initially registered in the wrong box on the IPSA weblink form as a donation, rather than income - a mistake my office immediately rectified.)

I do not believe that I am in breach of any of the rules, and am very concerned if there is any risk that I am, so I am today writing to you with all the details to seek clarification.

If you decide that I should have registered this brief piece of work, please accept my sincere apology and advise me how best to remedy the error.

I look forward to hearing from you.

Yours,

George Freeman.

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REGISTRATION WITH ACOBA OF WORK UNRELATED TO MY PREVIOUS MINISTERIAL ROLE

BACKGROUND

Having been elected in 2010 in the wake of the MPs expenses scandal I take the whole issue of transparency of MPs expenses and earnings very seriously and have always tried to make sure I set the highest standard (above and beyond the minimum compliance requirements).

Prior to my election in 2010 I had had a fifteen year career in life science technology company financing and management.

Conscious that I was likely to want to speak and work on life science issues as an MP, I decided, prior to my election, to give up my own small business as a Life Science Technology Venture Adviser.

When subsequently invited by the then Coalition Prime Minister David Cameron to take on a new role as (unpaid) Government Adviser on Life Sciences, I decided to sell (at a significant loss) my various small shareholdings in companies I had helped to create, to avoid the risk of any perception of a conflict of interest.

Following my move in 2016 by Prime Minister Theresa May from Minister of Life Science to a new (unpaid) non-Ministerial role as Chair of her Advisory Board, I opted to be bound by the Ministerial code, and strictly observed the requirement not to renew any former career earnings in the Life Sciences sector. (I continued to observe this well beyond the 2yr limit).

Following my departure as Minister at the Dept for Transport in the February reshuffle, I have been clear that I will of course strictly abide by the Rules requiring departing Ministers not to accept any paid roles in the sector that they have been responsible for, without the prior approval of ACOBA.

In March when the Covid crisis was spiralling and the Government launched an appeal for bids from the Life Science sector to help with incubators, PPE and other technological support with Covid, I offered my professional career expertise in technology due-diligence to help Ministers and officials sift through the wave of bids they were receiving, as it was clear to me that some would be far more worthwhile (and ethical) than others. This offer was politely turned down.

I then focussed my efforts on helping co-ordinate the emergency Covid response in my own constituency and county (including using my life science background to source a pro-bono charitable supply of disposable / dissolvable PPE laundry bags for Norfolk from a company contact in the renewable plastics sector:

(<https://www.google.co.uk/amp/s/www.bbc.com/news/amp/uk-england-birmingham-52384672>)

At the same time I was contacted by Matt Campbell-Hill, a medical inventor entrepreneur founder of the novel Aerosol Shield pop-up respiratory protection “tent”:

<https://www.google.co.uk/amp/s/thejournalofmhealth.com/innovative-pop-up-tent-developed-for-frontline-nhs-staff-treating-patients-with-covid-19/amp/>

to ask if I could help them get their innovative tent assessed by the NHS Covid Emergency Procurement unit, which I offered to do through the emergency PPE Supply channels set up by the Cabinet Office.

As part of that I joined two telephone conference calls with the NHS Procurement team and Aerosol Shield to be briefed on why the NHS procurement team could not fast-track the listing of the Aerosol Shield tent as PPE as requested by NHS medics who had used the tent (because the tent was deemed a medical “device” rather than PPE).

I neither sought nor received any remuneration from Aerosol Shield for this help which I viewed as part of my public duty as an MP in helping with a national public emergency.

ACOPA ADVICE

At that time I contacted ACOPA to let them know that as part of the Covid emergency I had been asked and offered to help some technology companies on an unpaid basis and was told that this didn't need to be registered, and understood that I only had to register any ongoing commercial role that might arise.

WORK WITH AEROSOL SHIELD

After Aerosol Shield had been refused NHS approval as PPE, the founder Matt Campbell Hill decided to focus on getting the shield tent invested in commercially as a start-up in the global respiratory health sector. In May MCH asked me if I would be willing to help him, and the founder scientists and medics behind the Aerosol Shield respiratory tent, raise funding for the R&D of the Aerosol tent and other protective respiratory products, and if successful to join the fledgling venture as Chairman.

I was happy to accept the offer and in June and July provided the Aerosol Shield team with commercial advice on raising funding for the R+D pipeline, their longer term commercial Business Plan and strategy.

I downloaded the ACOPA Registration form and completed it to send in. (Attached).

It quickly became clear that this role wasn't going to work and the founders of AerosolShield and I agreed to part company and that I would invoice for the initial commercial work done in June + July (I was very clear that I would not accept any remuneration for the work done in March and April which I was clear was done on a pro-bono public service basis).

In July I invoiced Aerosol Shield for my work, and have had no contact with the company since.

I never sought to conceal the work or income - I registered the work and income in the Register of Interests and because there was no ongoing commercial role it never occurred to me to register this with ACOPA.

As I understand it the ACOPA registration system is designed to ensure that there can be no risk of the reasonable suspicion of any conflict of interest or impropriety in the conduct of an MP's work in Parliament and in meetings with Ministers arising from any outside interests linked to their previous Ministerial role.

Given the circumstances - that my work for Aerosol Shield was not in any way linked to my previous Ministerial role at the Dept for Transport, but my previous professional career as a Life Science business adviser; that it was four years since my Life Science role in Government, and that I had not had any contact with Ministers or officials, or meetings or speeches in Parliament on anything related to Aerosol Shield, it didn't even occur to me that there might be a need to register with ACOPA.

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