



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former ministers (the Rules) seeking advice on taking up an appointment as a Senior Fellow with Mossavar-Rahmani Center for Business and Government, John F Kennedy School of Government, Harvard University (Harvard University). The material information taken into consideration by the Committee is set out in Annex A.
2. The purpose of the Rules is to protect the integrity of the Government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during time in office, alongside the information and influence a former minister may offer Harvard University.
3. 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

4. When considering this application, the Committee¹ took into account this role as a Senior 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 using privileged access to contacts and information to the benefit of themselves or those they represent; and to mitigate the risks that individuals may make decisions or take action in office to in expectation of

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

² By 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.

rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.

5. The Committee took into account that you did not meet with Harvard University while in office and there is no relationship between your former departments, Department for Business, Energy and Industrial Strategy (BEIS and Department for Education (DfE) and Harvard University. Further, the Committee noted you did not make any funding or policy decisions directly affecting Harvard University.

6. The Committee noted that this proposed role generally overlaps with your time in office. Therefore, there could be a perceived risk you had access to relevant privileged information and knowledge, which could unfairly benefit Harvard University. However, this role is with a foreign university and the unpaid nature of this appointment limits the real and perceived risk of you making improper use of information you had access to while in office for your personal benefit. Further, over 14 months have passed since you were in office; and you have an ongoing duty of confidentiality.

7. As above the Committee recognised that the risks in this unpaid appointment are limited. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. The standard conditions below, preventing you from drawing on your privileged information and using your contacts to the unfair advantage of Harvard University, will sufficiently mitigate the risks in this case.

8. Taking into account these factors, in accordance with the Government's Business Appointment Rules, the Committee advises this appointment with **Mossavar-Rahmani Center for Business and Government, John F Kennedy School of Government, Harvard 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 on behalf of Mossavar-Rahmani Center for Business and Government, John F Kennedy School of Government, Harvard University (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 Mossavar-Rahmani Center for Business and Government, John F Kennedy School of Government, Harvard 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 Mossavar-Rahmani Center for Business and Government, John F Kennedy School of Government, Harvard 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.

9. 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 as a member of the House of Commons.

10. 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.

11. 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.*" This Rule is separate and not a replacement for the Rules in the House.

12. 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. 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.

13. 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.

14. 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 Rt Hon Chris Skidmore MP

Annex A - Material information

The role

1. The website says the mission of the Mossavar-Rahmani Center for Business and Government is to advance the state of knowledge and policy analysis concerning some of society's most challenging problems at the interface of the public and private sectors. *'The scope of its work ranges from the local to the global. Drawing on the unparalleled intellectual resources of the Kennedy School and Harvard University, and bringing together thought leaders from both business and government, the center conducts research, facilitates dialogue, and seeks answers that are at once intellectually rigorous and policy relevant'*.
2. You said your role will be a one year fellowship to teach classes and prepare academic papers. You informed the Committee the title of the research project you would be working on is 'Mission Zero', a study into the prospect of achieving Net Zero by 2050. You do not expect your role to involve contact with government.

Dealings in office

3. You confirmed you did not meet with Harvard University nor make any decision relevant to the university. You also said you had no involvement in policy relevant to Harvard University nor did you meet with competitors of Harvard University. You also said you did not have access to sensitive information relevant to Harvard University.

Department Assessment

4. Both BEIS and DfE confirmed the details you provided and stated you had no access to sensitive information that could provide an unfair advantage to Harvard University.
5. Neither department has any concerns regarding this application.