



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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1. The Committee has considered your application to work with the Alan Turing Institute.

The Committee's role and remit

2. 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.
3. 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.
4. 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.
5. It is not the Committee's role to pass judgment on whether an appointment is appropriate or suitable in any other regard.

Appointment Details

6. You sought the Committee's advice on taking up an unpaid part time role as a Trustee for the Alan Turing Institute (ATI).

7. The ATI is the national institute for data science and artificial intelligence. It describes its works as undertaking research which tackles challenges in science, society and the economy. It collaborates with universities, businesses, public and third sector organisations. It is a registered UK charity. Your role as a Trustee would involve serving as an independent member of the Board of Trustees and offering strategic advice to assist ATI in its data science and artificial intelligence research.

8. You informed the Committee you had met with ATI on one occasion whilst in office. You confirmed you had no involvement in relevant policy development or decisions in relation to ATI and are unaware of any contractual relationship between the Department for Health and Social Care (DHSC) and ATI. You also informed the Committee that you are re-entering a sector that you have previous experience in, having had prior frequent engagement with data science, AI, 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)
- Chair of Genomics England (2020- Present)

9. Your former department, the Department for Health and Social Care (DHSC) was contacted about this application. It confirmed your application details and stated it had no concerns with you taking up this appointment. It noted that any meeting you had with ATI was part of general visits to meet staff and hear about its work. Whilst DHSC noted ATI would have some interest in health data policy which you were responsible for as Minister - it confirmed DHSC does not have a commercial relationship with ATI; you made no decisions that would have impacted ATI or their competitors; and due to the nature of ATI as an organisation it would not have conventional competition.

The Committee's consideration

10. The Committee noted that you made no contractual or specific policy decisions whilst in office that would have affected ATI directly and the Department has raised no concerns with this appointment. This role is an advertised, unpaid appointment; and the Committee considered the risk that this a reward for actions taken whilst in office is low.

11. The Committee also considered your responsibility for health data, research and innovation policy areas, and your ongoing role as Chair for Genomics England, noting both could be sensitive information you have access to which would present an unfair advantage to ATI. The Department also noted the nature of the organisation (a charity focussed on research and societal improvement) limiting the risk your access to information presents a conflict under the rules - in the sense of offering an unfair advantage. The Committee would therefore draw your attention to the conditions below which prevents you from drawing on any privileged information from your time in office, or in any ongoing role in which you have contact with the UK Government, to advise ATI.

12. As a former minister, you are also prevented from lobbying the UK Government, including indirectly via your contacts within Government/Whitehall; neither would it be appropriate for you to be involved in any future funding discussion with the UK Government, as the conditions below reflect.

13. The Committee would therefore recommend that this application to join the Alan Turing Institute be made 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 or its Arms Length Bodies on behalf of the Alan Turing Institute (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 the Alan Turing Institute (including parent companies, subsidiaries, partners and clients); and
- for two years from your last day in Ministerial office you should not undertake any work the Alan Turing Institute (including parent companies, subsidiaries, partners and clients) that involves providing advice on the terms of a bid with, or contract relating directly to the work of, the UK Government its Arms Length Bodies.

14. 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.

15. 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.*"

16. 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.

17. 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.

18. 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.

19. 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

Baroness Blackwood