

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: Lord Bethell of Romford, former Minister of Innovation, Department of Health and Social Care (DHSC). Unpaid appointment with King's College London, University of London.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the Government's Business Appointments Rules for Former Ministers (the Rules) on an unpaid role you want to take up with King's College London, University of London. The material information taken into consideration by the Committee is set out in the annex.
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during your time in office, alongside the information and influence you may offer King's College London, University of London. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. 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

5. When considering this application, the Committee¹ took into account this appointment 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 joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions or take action in office to in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. As Minister for Innovation, the Committee noted that this proposed role 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 King's College London, University of London. However, the Committee noted the Department's comments that you had no access to sensitive information and it is important to note you have been out of ministerial office for over a year. 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.
7. The Committee noted you will conduct interviews with scientists who have connections to government, as part of your research. This proposed contact is in keeping with the below conditions which make it clear you should not use your contacts and influence within government to the unfair advantage of the university. conducting academic research, there is limited scope for unfair advantage.
8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **King's College London, University of London** 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 or its arms' length bodies on behalf of King's College London, University of London (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 King's College London, University of London (including parent companies, subsidiaries, partners and clients); and

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

²By 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.

- for two years from your last day in ministerial office you should not undertake any work with King's College London, University of London (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 or its arms' length bodies.
9. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards/House of Lords Commissioners for Standards. It is an individual's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.
 10. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so and we will publish this letter on our website. Any failure to do so may lead to a false assumption being made about whether you had complied with the Rules.
 11. You must 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.
 12. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website

Annex - Material information

The role

1. You said it is an unpaid, part-time role (a meeting a month) with King's College London, University of London, where you will be a Senior Visiting Fellow, War Studies Department.
2. Its website says 'The War Studies Dept at KCL provides outstanding research-led teaching to the next generation of scholars in conflict, policy, and international relations from BA through to PhD'.
3. You said the role would include 'To develop and undertake a programme of research in collaboration with Dr Filippa Lentzos on national security implications of the current revolution in life sciences and specifically the dual-use risks of scientific collaboration on genomic research with CCP-controlled China'.
4. You said this is a research position with a focus on the science community and may include interviews with scientists who have connections with HMG.

5. You said you are a trustee of the International Centre for Study of Radicalisation at the War Studies Department at King's College London.
6. You also said you applied for a research position based on recommendations from academics and colleagues he knows from his trustee role.

Dealings in office

7. You advised the Committee that you did not meet with King's College London, University of London whilst in office. You said you did not have any involvement in policy, regulatory or commercial decisions that would have been specific to the university.

Department Assessment

8. DHSC confirmed the details you provided and had no concerns with the appointment
9. DHSC said it has several contracts with King's College London, mostly for artificial intelligence and Office for Health Improvement and Disparities (OHID) commissioned research, totalling around £5m.
10. DHSC recommended the standard conditions.