



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

Room G/08, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

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BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: The Rt Hon Sir Alok Sharma KCMG MP, former President for COP26 and, previous to that, Secretary of State for Business, Energy and Industrial Strategy. Unpaid appointment with the University of Oxford.

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 the University of Oxford as a Visiting Fellow.
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 the University of Oxford. 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 consideration

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. During your time at the Department for Business Energy and Industrial Strategy you approved funding to the University of Oxford to develop the Covid 19 vaccine - Imperial College was also funded for similar work. There is no reasonable concern that this unpaid role is connected to this approval.
7. As a former minister, there is an inherent risk associated with your network in government and access to information that could provide the University of Oxford with an unfair advantage. You confirmed your role will not involve contact with government 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.

The Committee's advice

8. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. Whilst there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below, preventing you from drawing on your privileged information and using your contacts to the unfair advantage of your new employer, will sufficiently mitigate in this case.
9. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **the University of Oxford** 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 the University of Oxford (including parent companies, subsidiaries, partners

¹This application for advice was considered by: Andrew Cumpsty; Dawid Konotey Ahulu CBE DL; Hedley Finn OBE; Isabel Doverty; Michael Prescott; Mike Weir; Sarah de Gay; The Baroness Jones of Whitchurch; and The Rt Hon Lord Eric Pickles.

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.

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 University of Oxford (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 the University of Oxford (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.
10. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; they are separate from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests³. You are reminded that as a Member of Parliament you have a separate ban on paid lobbying under the Parliamentary Code of Conduct. It is an applicant's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.
 11. 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.
 12. 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.
 13. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website

The Rt Hon Lord Pickles

³ All Peers and Members of Parliament are prevented from paid lobbying under the the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

Annex - Material Information

The role

1. You said that Oxford Martin School is part of the University of Oxford
2. According to the website:
 - a. it seeks to bring together a vibrant community of scholars, drawn from across the University of Oxford.
 - b. its research tackles issues of global significance and has a dedicated team working to ensure its research has an impact beyond academia.
 - c. it seeks to raise further support for its new and existing programmes, as well as opportunities to leverage the influence of its partners to increase the impact of its research.
3. You said responsibilities as a Visiting Fellow will include:
 - a. engaging with university researchers and students working on climate change and related topics.
 - b. advise the University as it develops its climate and environment strategy and seeks to engage with relevant parties in the private sector and abroad.
4. You said that your role will not have any contact or dealings with government.

Dealings in office

5. You advised the Committee of the following:
 - a. As Secretary of State the Department for Business, Energy and Industrial Strategy⁴ you approved funding to the University of Oxford to develop the Covid-19 vaccine
 - b. Secretary of State the Department for Business, Energy and Industrial Strategy and COP26 President you met and spoke with academics at the University of Oxford.
 - c. During your time as State the Department for Business, Energy and Industrial Strategy UK Research and Innovation (UKRI) was a non-departmental body of the department and would have provided funding to a wide range of organisations and universities such as the University of Oxford. You said UKRI made decisions independent of government.

Departmental Assessment

6. The Cabinet Office and the Department for Energy, Security and Net Zero (DESNZ) confirmed the details in your application and added:
 - a. DESNZ said you would have made decisions that impacted the entire sector in which it operates, for example energy and climate change but not specific to the University of Oxford.
 - b. The Cabinet Office said that you met with a variety of academic institutions at roundtables during your time as COP26 President, including the London School of Economics in December 2021. DESNZ said you would have met with the University of Oxford at roundtables.

⁴ In February 2023, the Department for Business, Energy and Industrial Strategy became three separate departments which are: the Department for Business and Trade; the Department for Science Innovation and Technology; and the Department for Energy, Security and Net Zero.

- c. The Cabinet Office and DESNZ said that you would have met with other universities during your time in office.
 - d. The Cabinet Office said that it does have a relationship with Oxford Said Business School Ltd and Oxford Global Projects UK Limited. Further, it may have come into contact with the university at roundtables.
 - e. DESNZ said that it does not have a direct relationship with the University of Oxford but it said the university does a lot of work in the Public Sector Decarbonisation Scheme which provides grants for public sector bodies to find heat decarbonisation and energy efficiency measures. For example, the University of Oxford received funding under these schemes to help decarbonise the estate⁵
 - f. The Cabinet Office and DESNZ confirmed it does not have concerns about your access to information given you have been out of office for over 18 months.
 - g. The Cabinet Office confirmed you did not make any funding for commercial decisions in your role as COP26 President specific to the University of Oxford.
 - h. DESNZ confirmed that you approved funding for the University of Oxford to develop the Covid-19 vaccine.(Other universities such as Imperial College London received funding to develop the Covid-19 vaccine⁶
7. The Cabinet Office and DESNZ recommended standard conditions.

⁵ <https://www.wolfson.ox.ac.uk/news/launching-wolfsons-end-carbon-emissions>

⁶ <https://www.imperial.ac.uk/news/197017/imperial-covid-19-vaccine-team-secures-225/>