



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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**BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: Sir Patrick Vallance
KCB FRS FMedSci FRCP HonFREng, former Government Chief Scientific
Adviser, the Cabinet Office. Paid appointment with Isomorphic Laboratories.**

1. Sir Patrick sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Crown Servants (the Rules) on an appointment he wishes to take up as Advisor to Isomorphic Laboratories (IsoLabs).
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 Sir Patrick's time in office, alongside the information and influence the Government's Chief Scientific Adviser may offer a company seeking to develop medicines through the use of AI. 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 Rules¹ set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants 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. Sir Patrick stated IsoLabs is an autonomous subsidiary of Alphabet that was launched from Alphabet's DeepMind in 2021. IsoLabs is a London-based drug

¹ Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code

discovery company, which uses artificial intelligence (AI). Sir Patrick wishes to join the company as an Advisor on drug discovery and development.

6. It is significant that the regulation of medicines sat outside of Sir Patrick's responsibilities in office and there is no commercial or policy specific relationship between Sir Patrick's former department, the Cabinet Office, and IsoLabs. Though he had some interactions with the company as a stakeholder as part of some of his review work, he made no decisions specifically affecting the company whilst in office. The Committee² considered there is no evidence this role could reasonably be perceived as a reward for decisions or actions taken whilst in office.

7. There are risks associated with Sir Patrick's access to information during his time in government. For example, he would have been privy to sensitive information relating to vaccines and therapeutics during the COVID-19 pandemic. The Committee agreed with the Cabinet Office that there are a number of mitigating factors that help reduce the risks associated with his access to information, including:

- The use of AI remains novel and exploratory; and his former department confirmed this was not part of the COVID-19 medical countermeasures work.
- AI and AI enabled drug research was not part of his role as the Government Chief Scientific Adviser.
- Medicines and drug regulation sits with the independent regulator at arm's length from the Department of Health and Social Care (DHSC) and was not under his purview as government's Chief Scientific Adviser at the Cabinet Office.
- It has been over 12 months since he was in office and last had access to information.
- The majority of the information relating to vaccines and therapeutics from his time in office is now published or out of date.

8. Sir Patrick will no doubt have contacts and influence within the UK government. As such, there are real and perceived risks his network gained in office might be used to assist IsoLabs unfairly. This is especially relevant as he wishes to discuss the company's work and the sector it operates in with the Medicines and Healthcare Products Regulatory Agency (MHRA). The Committee considered the risk he would offer unfair access to the MHRA as a result of his time in government service to be significantly limited. Sir Patrick gained extensive skills, experience and contacts in this field from his time in science and research - including his previous role as President, Research and Design at the pharmaceutical company GlaxoSmithKline. It is also relevant that where contact is instigated by MHRA or government departments/officials it would not be contrary to the lobbying ban - which is imposed on all former senior officials for 2 years on leaving office.

The Committee's advice

² This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; Sarah de Gay; The Rt Hon Baroness Jones of Whitchurch; Dawid Konotey-Ahulu CBE DL; The Rt Hon Lord Eric Pickles; Michael Prescott; and Mike Weir.

9. The Committee considered the risks associated with Sir Patrick's access to information are limited. Whilst there is a general overlap, the company's work is not directly related to his responsibilities in office, with the regulation and policy operations sitting with other parts of government. It has also been more than a year since Sir Patrick left office.

10. The most significant risk in this case is associated with the access to government he may be seen to offer IsoLabs, which it may not have without his time in office. However, it is significant he came into the role as a result of his experience and skills within the science and tech sector, including drug research and development immediately prior to joining government. The Committee considered the risks associated with Sir Patrick having contact with the MHRA to discuss AI in drug development and design are limited, as his experience and contacts here were not gained from his time in government office. In these circumstances, he could not reasonably be perceived as offering unfair access as a direct result of his time in office. In these circumstances, the Committee considered the condition below, which prevents Sir Patrick from lobbying the government should not apply to the MHRA.

11. Sir Patrick is currently working with the government at arm's length as a Non-Executive Director with the Advanced Research and Invention Agency (ARIA). The Committee noted that DSIT confirmed ARIA was content for Sir Patrick to take up this role and would consider and mitigate any potential conflicts. The conditions below also remind Sir Patrick that he must not make use of privileged insight gained from this role with ARIA.

12. The remaining risks can be mitigated by the conditions below which prevent Sir Patrick from making improper use of his access to privileged information, contacts and influence within government to the unfair advantage of IsoLabs.

13. The Committee's advice in accordance with the government's Business Appointment Rules is that this role with **Isomorphic Laboratories** be subject to the below conditions:

- he should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time in Crown service - which extends to any other role in which Sir Patrick continues to represent the UK government and its arm's length bodies;
- for two years from his last day in Crown service, he should not become personally involved in lobbying the UK government or any of its arm's length bodies, with the exception of the Medicines and Healthcare Products Regulatory Agency, on behalf of Isomorphic Laboratories (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage Isomorphic Laboratories (including parent companies, subsidiaries, partners and clients); and

- for two years from his last day in Crown service, he should not provide advice to Isomorphic Laboratories (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the the UK government or any of its arm's length bodies.

14. 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. 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.

15. 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 Ministerial Code/Civil Service Code or otherwise.

16. 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.*"

17. Sir Patrick must inform us as soon as he takes up this work or if it is announced that he will do so. Similarly, he must inform us if he proposes to extend or otherwise change his role with the organisation as depending on the circumstances, it might be necessary for him to seek fresh advice.

18. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Cat Marshall
Committee Secretariat

Annex - Material information

³ All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on 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.

The role

1. Sir Patrick described IsoLabs as an autonomous subsidiary of Alphabet that was launched from Alphabet's DeepMind in 2021. Alphabet is the holding company that owns Google and its various subsidiaries. Sir Patrick said it is an early stage science-based company that is attempting to revolutionise the discovery and development of new medicines through the use of artificial intelligence (AI). According to its website, IsoLabs is a London-based drug discovery company, which uses AI for drug discovery. Sir Patrick said that Isomorphic is a very early stage drug discovery company and will not have any product that would come to MHRA for product approval for many years - he suggested at least 5 and more likely 10.
2. Sir Patrick wishes to become a part-time, paid Advisor (on drug discovery and development). Sir Patrick stated his responsibilities will involve providing guidance in the framing of and collaborating in the execution of various roadmaps and initiatives related to:
 - digital biology;
 - AI-enabled drug design and development (pre-clinical and clinical);
 - global regulatory interactions and approvals related to such technologies;
 - associated legislation and regulation; and
 - collaboration on presentations, position papers or other publications, in particular directed to approaches to advance preclinical and early stage clinical studies driven by AI predictions.
3. Sir Patrick said his role would not involve lobbying or commercial/contractual interactions with the government. Sir Patrick does consider it likely he will interact with the UK regulator, MHRA. As drug development is a global issue, other international regulators such as the US Food and Drug Administration (FDA) and the European Medicines Agencies (EMA). He said that discovering new medicines through the use of AI will lead to different paths for assessing wanted and unwanted effects of drugs and for the evaluation in clinical trials. In considering how AI will shift the paradigm for drug discovery and development will change means engaging with regulators at a very early stage, as they too are trying to learn what AI can and cannot do.
4. Sir Patrick said the nature of interactions with regulators is likely to involve discussing where AI could/would potentially do things differently and what that would mean for how regulators could consider the outputs.

Sir Patrick's pre government career

5. Sir Patrick stated that the proposed role would be a return to playing a part in trying to discover new medicines, but using a completely new approach of AI. He stated that his experience of drug discovery, development and global regulatory approaches will be applied to this new paradigm, which is as yet unproven and for which there are no clear paths to regulatory assessment. He said his expertise and knowledge in this area and his relationships with regulators predate his time in government and he gained none in office. He notes that the government benefited from his background here whilst he was in government.
6. Prior to joining government, Sir Patrick held a range of roles in the science and tech sector:
 - President, R&D at GlaxoSmithKline (GSK) from 2012 until 2017.
 - Prior to this, he was Senior Vice President, Medicines Discovery and Development and before that Head of Drug Discovery.
 - Prior to joining GSK, he was a clinical academic, Professor of Medicine and led the Division of Medicine at UCL.
 - He also has many years' experience of basic science and clinical research, and was a consultant physician in the NHS - from work on medicinal chemistry and structural biology, through to cellular work, studies in humans and use of large electronic health record databases.
7. Sir Patrick stated that the role was offered to him in February 2024. He noted that he has a historic relationship with DeepMind (parent company of IsoLabs) from before joining the government from when he was head of R&D at GSK. He stated he has also spoken about the potential of AI in this and other areas in public lectures.

Ongoing role with government

8. Additionally, Sir Patrick informed the Committee he continues to represent the government in the following public appointments: Non Executive Director with the Advanced Research and Invention Agency (ARIA) and Chair of the National History Museum. Sir Patrick noted ARIA has a very clear and public policy on conflicts of interest published on the ARIA website. This is handled in line with the Code of Conduct for Board Members of Public Bodies and DSIT confirmed the Permanent Secretary has no issue with this role and any potential conflicts would be managed by ARIA.

Dealings in office

9. Sir Patrick told the Committee he was responsible for broadly related matters, but nothing specific to IsoLabs, including:

- Supporting emerging digital technologies, including the Pro Innovation Regulation of Technologies Review - which was published by HMT and in the public domain. Government's response accepted Sir Patrick's recommendations and set out how these will be implemented. This included that the increased use of AI is a strategic priority which may have significant and profound uses in the development of new medicinal compounds.
 - The 10-Point Science and Tech Framework published by DSIT in March 2023, setting out the government's approach to making the UK a science and technology superpower by 2030.
 - He had some involvement with the MHRA during the early work of the Vaccines Task Force, though no role in policy or regulatory decisions related to companies, IsoLabs or otherwise; nor was he involved in regulatory assessment or approval processes for COVID-19 vaccines.
10. Sir Patrick noted he met with the CEO of DeepMind during the early stages of the COVID-19 pandemic, where he attended one meeting of The Scientific Advisory Group for Emergencies (SAGE). SAGE provides scientific and technical advice to support government decision makers during emergencies.
11. Sir Patrick had contact with IsoLabs in relation to the G7 work he led, on the '100 Day Mission' to produce drugs, vaccines and therapeutics within 100 days of a pandemic being identified. He said his team was interested in determining whether companies using AI for drug discovery could help develop a library of potential medicines for major pandemic threat classes. This work was published by the Cabinet Office in December 2021.
12. Sir Patrick noted he also sought advice/input from a range of companies when undertaking the work on the Pro Innovation Regulation of Technologies Review described above, including IsoLabs

Departmental Assessment

13. The Cabinet Office confirmed the details that Sir Patrick provided including that he made no decisions specific to IsoLabs. It also provided the following information:
- Sir Patrick was involved in broader policy measures such as the Pro-Innovation Regulation of Technology and the 10 Point Science and Tech framework (which are decisions that are published and in the public domain as of March 2023) - none specific to IsoLabs.
 - it has no commercial relationship with IsoLabs
 - whilst Sir Patrick would have been privy to sensitive information relating to vaccines and therapeutics during his time in post during the

COVID-19 pandemic. The Government Office for Science confirmed any information relevant to the COVID-19 response was shared freely with all relevant people in government at the time and is no longer sensitive or likely to offer advantage to IsoLabs.

- the use of AI in this field is novel and exploratory at this time, and was not part of the COVID-19 medical countermeasures work, therefore limiting the sensitive information he may possess relating to the work of IsoLabs.
- he was not involved in any commercial decisions specific to IsoLabs or its competitors.

14. The Cabinet Office concluded that it is likely he had access to some general privileged information in the wider health sector, however his access to sensitive information is limited noting:

- the time elapsed (over 12 months) since Sir Patrick left government and had access to information;
- that the policy work he had involvement in is in the public domain (Pro Innovation Regulation of Technologies Review, 10 Point Science and Tech framework);
- his focus in post was on COVID-19 the majority of the information relating to it is published or out of date
- his role as GCSA was not focussed in AI and AI-enabled research into drug development.

15. Overall, the Cabinet Office's view was that given the career history of Sir Patrick, it is unlikely that his proposed role with IsoLabs would be seen as a reward for actions taken in government, rather than being based on his skills and experience. It said for someone with the career history of Sir Patrick, this move has a limited risk to the integrity of government and recommended the standard conditions.