

From the Chair



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: George Freeman FRSA MP, former Minister of State for Science, Research and Innovation. Paid appointment with The Guy Foundation Family Trust.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) seeking advice on taking up a paid role as an Advisor to the Board of Trustees with The Guy Foundation Family Trust (The Guy Foundation).
2. The purpose of the Rules is to protect the integrity of the government. The Committee¹ 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 Guy Foundation as a former minister. 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.

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

The Committee's consideration of the risks presented

5. The Guy Foundation is a non-profit research foundation that supports, leads and coordinates research into quantum biology with the goal of advancing health and medicine. The Guy Foundation is a stakeholder to your former department, the Department, Science, Innovation and Technology (DSIT). As the Minister of State for Science, Research and Innovation at DSIT, you had involvement in the National Quantum Strategy² published in March 2023, outlining the government's ambitions for cementing the UK as a leader in quantum technologies. DSIT confirmed the National Quantum Strategy did not specifically impact The Guy Foundation, nor were you involved in any other policy, regulatory or commercial decisions specific to the organisation. The Committee considered the risk you could reasonably be seen to have been rewarded for decisions made in office was low.
6. As the Minister of State for Science, Research and Innovation at DSIT, you would have had access to privileged information on scientific and technological policies. DSIT is not aware of any sensitive information you possess that may confer an unfair advantage on The Guy Foundation. Additionally, DSIT noted that the value of any such information will have significantly reduced given the time that has passed since you left government and last had access to information (14 months), and the subsequent change in government.
7. There are risks associated with your influence and network of contacts gained in ministerial office. In particular, you may be seen to offer unfair access to a foundation that may be interested in funding priorities in the sector. You noted you have made it clear to the organisation that you will not lobby government on its behalf, and this will not form part of your role.
8. There is also a risk if your role in seeking funding and investment outside of government were to draw specifically on contacts in the private sector and/or foreign governments gained as a result of your time as a minister. The Committee's consideration also recognised that you have a background in a similar area outside of your time in government and will likely have a network from this experience that you can draw upon.

The Committee's advice

9. The Committee considered the risks associated with your access to information to be limited for the reasons above. The main risks are that you

² <https://www.gov.uk/government/publications/national-quantum-strategy>

could be seen to make improper use of privileged contacts. The conditions below adequately mitigate the risks. They seek to prevent you from making use of privileged information, contacts and your influence to the organisation's unfair advantage.

10. Additionally, the Committee imposed a restriction on lobbying contacts you made during your time in office in other governments and organisations outside of the UK government for the purpose of securing business for The Guy Foundation.

11. In accordance with the government's Business Appointment Rules, the Committee advises that this appointment with **The Guy Foundation Family Trust** 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 any of its arm's length bodies to or on behalf of The Guy Foundation Family Trust (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or ministerial office to influence policy, secure business/funding or otherwise unfairly advantage The Guy Foundation Family Trust (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in ministerial office, you should not provide advice to or on behalf of The Guy Foundation Family Trust (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 UK government or any of its arm's length bodies;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying contacts you developed during your time in office in other governments and organisations for the purpose of securing business or funding/investment opportunities for The Guy Foundation Family Trust.

12. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; there are separate 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' Interests.³ 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.

13. 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.
14. 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.'*
15. You must inform us as soon as you take up employment with this organisation, or if it is announced that you will do so. You must 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.
16. 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

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. The Guy Foundation is a UK-based charitable foundation (registered charity in England and Wales no. 1178782) established in 2018 to facilitate thinking and research on the role of quantum mechanics and thermodynamics in living systems, with the ultimate goal of using this understanding to advance healthcare. The charity curates, leads and funds an interdisciplinary research collaboration and has published a number of scientific papers. It also supports the scientific community by convening online symposia on quantum biology and bioenergetics and hosts an active network of over 200 scientists and institutions globally.
2. You described your paid role as Advisor to the Board of Trustees to involve:
 - Advising the Trustees on the long term development of The Guy Foundation into a leading global platform for the raising awareness of and funding for research and development of Quantum Biology as a foundation for fundamental life and space science, including through training, accreditation and exploring potential global research and development collaborations and co-investment opportunities, in particular opportunities for the application of quantum biology as it may pertain to mainstream medicine.
 - In the first instance the areas of life science most pertinent to the role will be that of the impact of quantum biology on the health of space travellers.
 - Promoting the science and potential applications of quantum biology, liaison with relevant companies, agencies and institutes to establish collaborative research programmes and associated funding and a long term business plan for the Foundation.
 - No contact with or lobbying of government.
3. You said you considered this as returning to a former career in which you worked for 15 years prior to becoming an MP and then a minister. You said your previous work focused on science and technology consulting, corporate finance advisory, and investing. You worked for the Cambridge Cluster⁴ from 1996 to 2010, founding and financing high growth technology companies and promoted industries in biology and life sciences. You stated you hope to bring your professional experience of fundraising and investment to this role.

Dealings in office

⁴ <https://www.cambridgenetwork.co.uk/the-network/cambridge-cluster>

4. You advised the Committee that you did not meet with, hold access to sensitive information about, nor made decisions specific to The Guy Foundation.

Departmental assessment

5. DSIT provided its views on your appointment, stating:
 - You were involved in The National Quantum Strategy, which was published in March 2023 whilst you were in office. The department does not consider the strategy to have directly or significantly benefited The Guy Foundation.
 - You were not involved in any decisions specifically impacting the organisation.
 - The Guy Foundation is a DSIT stakeholder - DSIT stated junior officials from DSIT's Office for Quantum have corresponded with representatives from the Guy Foundation and met on two occasions. Both of these meetings were high-level conversations to better understand The Guy Foundation's work and discuss the National Quantum Strategy. There is no formal relationship between DSIT and The Guy Foundation beyond this.
 - DSIT does not consider you to possess sensitive information that may confer an unfair advantage, noting the time elapsed since you left office (over 14 months) and change in government.
6. DSIT recommended the standard conditions applied.