



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Michelle Dyson CB, former Director General for Adult Social Care at the Department of Health and Social Care. Paid appointment with Alzheimer's Society.

1. Ms Dyson sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Crown Servants (the Rules) on taking up a role with Alzheimer's Society as Chief Executive Officer (CEO).
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 taken during Ms Dyson's time as the Director General for adult social care, alongside the information and influence she may offer Alzheimer's Society. 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 Rules set out that Crown servants must abide by the Committee's advice¹. 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.

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.

The Committee's consideration of the risks presented

5. Alzheimer's Society describes itself as the UK's leading charity dedicated to combating dementia through support services, campaigning and funding research. As CEO, Ms Dyson said she will be responsible for providing leadership to achieve the Society's mission, working with the Board on strategy, leading the senior team and being responsible for the financial health of the organisation. Her role will also involve developing strategic relationships with government departments and acting as an ambassador for the Society.
6. There is a broad overlap with Ms Dyson's work and that of Alzheimer's Society. Some of her work, albeit indirectly, will have had an impact on those living with Alzheimer's and therefore whose interests the organisation is focussed on. Ms Dyson had some contact with Alzheimer's Society whilst Director General for Adult Social Care at the Department of Health and Social Care (DHSC) - in the context of stakeholder engagement. There is also a funding relationship between Alzheimer's Society and the wider government, given it partners with the health system on research and services. DHSC confirmed Ms Dyson made no contractual, funding or policy decisions in office specific to Alzheimer's Society. The Committee² therefore considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office was low.
7. Ms Dyson would have had access to a broad range of sensitive information having been responsible for teams within DHSC working on matters related to Alzheimer's Society. DHSC is not aware of any sensitive information that could unfairly advantage Alzheimer's Society, particularly in light of the nature of the organisation. The following factors help to reduce the risk Ms Dyson's access to information could provide any improper advantage to the organisation:
 - Alzheimer's Society is already a strategic partner of DHSC and the wider health system in delivering the research needed to improve results for patients with dementia.
 - Ms Dyson was not involved in the proposal contained in the 10 Year Health Plan for England for "Modern Service Frameworks" with frailty and dementia among the early priorities.
 - The future of this work is unknown to Ms Dyson and it is unlikely that any insight she might possess, having only just left office, would offer an unfair advantage to one of the government's partners in that future work. This is especially true when there is no evidence Ms Dyson has had any involvement or access to information on matters related to

² This application for advice was considered by Sarah de Gay; Isabel Doherty; Hedley Finn OBE; Dawid Konotey-Ahulu CBE DL; Michael Prescott; and The Baroness Thornton.

funding which sat outside her area of responsibility and at arm's length from DHSC.

8. The Committee considered the potential risk of unfair influence arising from Ms Dyson's recent role at DHSC. Particularly given the charity's interest in developing strategic relationships with and influencing the government. Ms Dyson said her dealings with government would not necessarily amount to what she considered lobbying, but she might expect to have some contact with the government. The Committee considered whether this would be improper, given the lobbying ban which applies to all senior officials on leaving office.
9. The nature of the organisation is relevant to the risks here. Alzheimer's Society is a registered charity, which already works closely with the government, not least given the recent announcement of various projects to be delivered in partnership between the government, the NHS, Alzheimer's Society and others in the third sector to improve the health outcomes for those living with dementia. It shares its aims with government - supporting those with dementia. It therefore has no competitors in a commercial sense. It does compete alongside others for funding and donations as do all charitable organisations. It would be improper for Ms Dyson to lobby the government in respect of specific contracts or funding arrangements, particularly when there are others in the organisation who can do so. To do so may give rise to a reasonable concern of undue influence as a result of her time as a senior official at DHSC.
10. It would not be improper for Ms Dyson to engage with the government where she is invited to do so, or where she is providing information transparently - such as reporting on the organisation's work. Ms Dyson's role as described is not to influence specific pieces of government policy or work on commercial and funding matters. Rather she describes continuing to engage with the government using existing frameworks to aid government and NHS provision to those affected by dementia and Alzheimer's. Whilst Ms Dyson has worked closely with a limited number of people on relevant policy at DHSC, she and the department have demonstrated that wider work on research, drugs and delivery of services sat outside her purview.

The Committee's advice

11. For the reasons set out above, the risks associated with Ms Dyson's access to information are significantly limited and there is no real risk of reward. The risks under the Rules the Committee is concerned with are those associated with the possible unfair access and influence any senior civil servant from DHSC might offer.

12. Given the nature of Alzheimer's Society, the Committee agreed with the department it is unlikely there would be a reasonable suspicion that Ms Dyson offers a significant unfair influence within government especially if she is prevented from making improper use of her privileged network of contacts in office. In coming to this conclusion the Committee was mindful of both the existing framework of engagement between government and the organisation and the lack of commercial gain that can reasonably be interpreted.
13. The Committee determined the risks identified in this application can be appropriately mitigated by conditions below. These make it clear she cannot make use of any privileged access to information, contacts or influence gained from her time in government service to the unfair advantage of Alzheimer's Society.
14. The Committee's advice in accordance with the government's Business Appointment Rules is that Ms Dyson's appointment with **Alzheimer's Society** be subject to the below conditions:
- she should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time in Crown service;
 - for two years from her last day in Crown service, she is permitted to report to government and its arm's length bodies on the activities of Alzheimer's Society; and enter into discussions/meetings with the UK government or its arm's length bodies where it is at their request or using existing engagement channels. However, she should not become personally involved in lobbying the UK government or any of its arm's length bodies, on behalf of Alzheimer's Society (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage Alzheimer's Society (including parent companies, subsidiaries, partners and clients); and
 - for two years from her last day in Crown service, she can draw on her skills and experience to advise Alzheimer's Society on its internal strategy and proposals relating to already agreed government funding. However, she should not undertake any work with Alzheimer's Society (including parent companies, subsidiaries, partners and clients) that involves advising on the terms of bids to secure governmental funding/contracts.

15. The advice and the conditions under the government's Business Appointment Rules relate to Ms Dyson's 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.
16. 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.
17. 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.*"
18. Ms Dyson must inform us as soon as she takes up this work or if it is announced that she will do so. Similarly, she must inform us if she proposes to extend or otherwise change her role with the organisation as, depending on the circumstances, it might be necessary for her to seek fresh advice.
19. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Yours sincerely,

Madeleine Crowther
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 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.

The role

1. Alzheimer's Society is a UK charity dedicated to combating dementia through support services, campaigning and funding research. The organisation provides comprehensive support services for individuals living with dementia and their carers, campaigns for increased public understanding and improved government policy, and funds research to advance diagnosis and treatment.
2. Ms Dyson wishes to take up a paid, full-time role as the Chief Executive of the Alzheimer's Society. Amongst other things her responsibilities will include leading the organisation; shaping its strategy, including on funding; responsibility for its governance financial health; and acting as its public representative.
3. In respect of her contact with government, she said this would include:
 - continuing the current regular engagement with ministers and with officials. She said this tends to be information exchange rather than lobbying.
 - supporting NHS England with the delivery of a 'modern service framework for dementia and frailty'. DHSC published its ten year health plan in July setting out this commitment to modernise services and provide more devolved, localised healthcare. Alzheimer's Society and its network of people with lived experience will be a key partner for this work.
 - supporting DHSC and NHS England with the delivery of neighbourhood health as announced in the ten year health plan. The aspect that will be relevant to Alzheimer's Society will be neighbourhood health as it applies to people with frailty/dementia. The work will be run at local level, but there may be the need to develop central government principles for delivery. The Alzheimer's Society will have critical insight to bring to this work.
 - Publishing the Alzheimer's Society operational data to show the interaction between key government priorities on reducing avoidable admissions into hospital/speeding up discharges from hospital and patients with dementia.
 - Engaging with NICE and MHRA on the case for the licensing and NHS availability of new drugs.
 - Supporting the Care Quality Commission who are keen to have more of a focus on dementia in its health and care inspections - bringing the Alzheimer Society's expertise, including through those with lived experience, to help ensure effective delivery.

4. Ms Dyson added that while she would anticipate that someone else in the organisation would lead all the engagement, as CEO she would want to leave open the possibility of occasional involvement herself, and suggested issues around lobbying would be answered by full transparency (e.g full meeting notes, clarity on attendees etc).

Dealings in office

5. As the Director General for Adult Social Care, Ms Dyson was responsible for the development of dementia policy within the Department of Health and Social Care (DHSC). In this capacity, she had some contact with the Alzheimer's Society by email and invited the previous Chief Executive to two roundtables Ms Dyson hosted.
6. To illustrate her lack of involvement in dementia policy, Ms Dyson said:
 - she had two full time equivalent members of staff who work on dementia, out of an overall headcount of 300;
 - she personally had 'very little to do with dementia policy' and delegated it;
 - in five years, she attended four meetings on dementia; and
 - she was unaware of the specifics of a 'modern service framework' and how it applied for dementia until the 10 year health plan was published.

Information in the Public Domain

7. The '10 Year Health Plan for England: fit for the future'⁴
 - Sets out that, as part of a new quality strategy, the National Quality Board will oversee the development of 'Modern Service Frameworks' with frailty and dementia being among the early priorities.
 - These frameworks will define long-term goals and identify evidence-based interventions to improve care quality and reduce variation in outcomes.
8. Government-backed technologies support those living with dementia⁵
 - DHSC issued a press release about partnering with Alzheimer's Society through UK Research and Innovation, the Engineering and Physical Sciences Research Council, and the National Institute for Health and Care Research (NIHR) to fund new research networks.

⁴ <https://www.gov.uk/government/publications/10-year-health-plan-for-england-fit-for-the-future/fit-for-the-future-10-year-health-plan-for-england-executive-summary>

⁵ <https://www.gov.uk/government/news/government-backed-technologies-support-those-living-with-dementia>

- Relevant to the application as it demonstrates that the Alzheimer's Society is a key partner in the delivery of these government projects, and the research networks will work in collaboration with them.

Departmental Assessment

9. DHSC confirmed the information provided by Ms Dyson above, including that:
 - she did not make any policy, regulatory or commercial decisions specific to Alzheimer's Society
 - whilst she was responsible for dementia policy - her personal involvement was limited and others in the department are responsible for dementia drugs and dementia research
 - she had occasional contact with Alzheimer's Society as described above
10. The department stated Ms Dyson had wide knowledge of the health and social care sector, though nothing specific to Alzheimer's Society. It also noted that Alzheimer's Society is a charity with no obvious commercial competitors it could have an unfair advantage over in the space.
11. DHSC recommended standard conditions.