

Cabinet Office

15 January 2025

**Application to establish an independent consultancy under the Business Appointment Rules from Professor Dame Jenny Harries DBE DL, former Chief Executive, UK Health Security Agency at the Department of Health and Social Care.**

Thank you for submitting an application for advice under the Business Appointment Rules (the Rules) to the Civil Service Commission (the Commission) on behalf of **Dame Jenny Harries DBE DL**, formerly Chief Executive of the UK Health Security Agency (UKHSA), an arm's length body of the Department of Health and Social Care (DHSC). The application is to establish an **independent consultancy**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Dame Jenny is a civil servant at SCS Pay Band 4. Her last day of service was 31 May 2025.

The purpose of the Rules is to protect the integrity of the government. They aim to avoid any reasonable concerns that: a civil servant may be influenced in their official duties by the risk of reward; a civil servant may improperly exploit access to information; and an organisation may gain an improper influence through the employment of a civil servant.

The Commission's advice<sup>1</sup> is that this application to establish an independent consultancy should be subject to the following conditions:

1. Privileged information – Dame Jenny should not draw on (disclose or use for the benefit of herself the persons or organisations to which this advice refers) any privileged information available to her from her time in office.
2. Lobbying – For two years from her last day in office, until 31 May 2027, Dame Jenny should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of her independent consultancy (including parent companies, subsidiaries, partners and clients). She should also not use, directly or indirectly, her contacts in the government and/or civil service to influence policy, secure business/funding or otherwise unfairly advantage her

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<sup>1</sup> See [Advice under the Business Appointment Rules](#) for details applying to all advice issued by the Civil Service Commission.

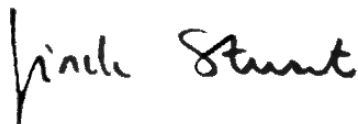
independent consultancy (including parent companies, subsidiaries, partners and clients).

3. Bids and contracts – For two years from her last day in the civil service, until 31 May 2027, Dame Jenny should not provide advice to any company or organisation on behalf of her independent consultancy on a bid or contract relating to the UK government or its arm's length bodies.
4. Independent consultancy – For two years from her last day in civil service, until 31 May 2027, before accepting any work for her independent consultancy and or/before extending or otherwise changing the nature of her work, she should seek advice from the Commission. The Commission will decide whether each piece of work is consistent with the terms of the consultancy and consider any relevant factors under the Rules. This excludes work that falls into the following categories: unpaid roles; non-executive charitable roles; academic roles (such as teaching, research or peer review); journalism and media appearances (excluding corporate or management roles in media organisations); or one-off speaking engagements. In these cases, the other conditions outlined in this letter will still apply.

The Rules set out that civil servants must abide by the Commission's advice. It is Dame Jenny's personal responsibility to manage the propriety of any appointment and to understand any other rules and regulations she may be subject to in parallel with the Commission's advice.

Dame Jenny must seek advice if she proposed to extend or otherwise change her consultancy work. Once this appointment has been publicly announced or taken up, the letter will be published on the Civil Service Commission's website.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gisela Stuart', written in a cursive style.

**Gisela Stuart**

First Civil Service Commissioner

## **Annex A: The application**

### Applicant assessment

1. Dame Jenny stated that she will be setting up her own consulting service. She said this work will be both on a paid and unpaid basis. Dame Jenny stated that the new consultancy company will initially offer services based on her existing skills and expertise and will provide professional consultancy with a focus on public health including population health, health protection, international health and health economics.
2. Dame Jenny stated that the skills and knowledge offered by her independent consultancy will come from her academic qualifications earned before civil service roles and her long career in medicine and public health, including work in local and central government, universities, and health services across the UK and internationally.
3. Dame Jenny stated she may consult on a wide range of public health areas, including health improvement and promotion; strategic planning for health services; public sector commissioning; clinical epidemiology, pharmacology, and infectious disease management; health protection and emergency response; environmental health risks; leadership, training, and promoting STEM careers (especially for women and for gender equality/diversity); and general and executive management.
4. Dame Jenny stated specific contracts will be negotiated individually as they arise. To comply with the two-year period she is subject to the Rules, which started on 31 May 2025 (the last day of her civil service employment), she stated the following activities of her consulting work will be rejected or limited:
  - Direct lobbying of Ministers in areas where she has relevant senior civil service experience or information.
  - Personal work on products or services where a contract with the government has or could be enacted (for example, specific drugs or vaccines).
5. The UK Health Security Agency (UKHSA) is the UK's lead body responsible for protecting the population from infectious diseases and external health threats. Its functions include nationwide disease surveillance, managing public health emergencies and providing scientific leadership to guide government strategy on health protection, ensuring the country is resilient against future health crises. The Secretary of State for Health and Social Care sets the strategic priorities for the UKHSA and holds its Chief Executive accountable for its performance. The Department for Health and Social Care (DHSC) provides the

funding and policy framework within which the UKHSA operates. As Chief Executive, Dame Jenny was responsible for leading the agency. She was accountable for its strategy, operations and the effective and efficient use of public funds.

6. These responsibilities included finance, personnel, operations, science delivery, research, emergency response, clinical and public health advice, and support for policy development on health protection issues (including infectious diseases, chemical, radiation, environmental, and climate threats).
7. Separate from her consulting work, Dame Jenny noted that she may continue to provide professional expertise on public health or science issues relevant to government at its request, as she has done previously.

#### Departmental assessment

8. Whilst Dame Jenny had broad oversight of decisions impacting broader biotechnology, life sciences and various health policy areas, the Cabinet Office and DHSC do not consider her to have had any involvement in decisions specifically relevant to the establishment of her consulting business.
9. The Cabinet Office noted that while Dame Jenny had access to commercially sensitive information, the Cabinet Office and DHSC is satisfied that this information is no longer relevant or nearly so, given that more than six months have passed since she left the role.
10. The Cabinet Office stated that Dame Jenny's consulting work is unlikely to attract criticism, reasoning that it is a new company established to provide services that draw on her extensive clinical and academic expertise spanning a lifetime career in medicine and public health. In a similar vein, DHSC does not believe this work provides her with an unfair advantage. Both departments noted that Dame Jenny's prior and long-standing background in clinical, academic, and public health further reduces the likelihood that her consulting work will be perceived as a result of actions she took while in the civil service.
11. The departments did not have concerns with the establishment of her independent consultancy as described and recommended the standard conditions.

#### CSC analysis

12. *Risk of reward.* As Dame Jenny is establishing a new company, the risk of reward for decisions or actions taken in office is likely to be low.

13. *Access to information.* Dame Jenny will have had access to a wide range of information, which could provide an unfair advantage to future clients of her independent consultancy. This risk is reduced by the six months which have passed since leaving the civil service and the fact that the departments are unaware of any sensitive information she may possess that could offer an unfair advantage. Significantly, the Commission noted:

- Dame Jenny's role was focused on national health protections and strategy, not commercial work with start-ups. The exception of Moderna in the early stages of the pandemic was now a number of years ago.
- Though she had oversight of contracts impacting the biotech sector, as well as strategic interactions and involvement with the wider biotechnology and life sciences communities, the UKHSA's direct contractual and commercial links are handled by a dedicated commercial team and she had no direct involvement in the work.
- The government has now published 'The UK's Modern Industrial Strategy 2025'<sup>2</sup> which sets out its ten year plan and places the government's high-level priorities for the Life Sciences in the public domain. It has also published the Autumn Budget 2025<sup>3</sup>, setting out strategic information related to the priorities of DHSC and UKHSA, including funding.

14. *Improper influence.* As a senior official, there is a risk that Dame Jenny's government contacts may present an unfair advantage to potential clients of her consulting work. Given the lobbying ban that applies to all former senior civil servants, Dame Jenny cannot have contact with ministers or officials that could reasonably be seen as seeking to influence government. It is significant to note that Dame Jenny stated she would not have contact with government as part of her consulting work. The risks relating to lobbying and/or involvement in government bids and contracts are mitigated by the standard conditions.

15. Dame Jenny noted that she may continue to provide her professional expertise on public health or science to government. The Commission's view is that providing this input at government's request would not be considered improper under the lobbying ban, especially as this will sit separate from her proposed consulting work.

16. *Independent consultancy.* This advice provides Dame Jenny consent only to set up a consultancy, subject to a number of conditions. The proposed scope of her consultancy overlaps with the substance of her time in office. As advised

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<sup>2</sup> UK Modern Industrial Strategy 2025: <https://www.gov.uk/government/collections/the-uks-modern-industrial-strategy-2025>.

<sup>3</sup> Budget 2025: <https://www.gov.uk/government/publications/budget-2025-document/budget-2025.html>.

by the government's BARs guidance, before accepting any work for her independent consultancy and or/before extending or otherwise changing the nature of her work, she should seek advice from the Commission. However in this instance, this will exclude work that falls under the following categories: unpaid roles; non-executive charitable roles; academic roles (such as teaching, research or peer review); journalism and media appearances (excluding corporate or management roles in media organisations); or one-off speaking engagements. In these cases, the other conditions outlined in this letter will still apply.

17. *Waiting period.* As a former SCS Pay Band 4 official, Dame Jenny is subject to a three month waiting period upon leaving government service in taking up any appointments or establishing an independent consultancy. As Dame Jenny left the civil service over six months ago, this period has elapsed.