

Cabinet Office

10 February 2026

Application from Professor Dame Jenny Harries DBE DL, former Chief Executive of the UK Health Security Agency (UKHSA), for a paid commission with CSL Seqirus as a client of her independent consultancy.

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 for a commission with **CSL Seqirus** to be a client of her **independent consultancy**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Dame Jenny was 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.

In line with the conditions applied to Dame Jenny's independent consultancy, the Commission's advice¹ is that this commission with CSL Seqirus should be subject to the same 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 CSL Seqirus (including parent companies, subsidiaries, partners and clients) under her independent consultancy. 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 CSL Seqirus (including parent companies, subsidiaries, partners and clients) on behalf of her independent consultancy.

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

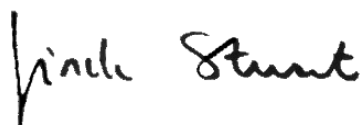
3. Bids and contracts – For two years from her last day in the civil service, until 31 May 2027, Dame Jenny should not provide advice to CSL Seqirus on behalf of her independent consultancy on a bid or contract relating to the UK government or its arm's length bodies.

As a reminder, for two years from her last day in civil service, until 31 May 2027, Dame Jenny should continue to seek advice before accepting new work for her consultancy, in line with the conditions outlined in the Commission's initial approval.

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 proposes to extend or otherwise change her role with the organisation. Once this appointment has been taken up, the letter will be published on the Civil Service Commission's website.

Yours sincerely,

A handwritten signature in black ink that reads "Gisela Stuart". The signature is written in a cursive style with a large initial 'G'.

Gisela Stuart
First Civil Service Commissioner

Annex A: The application

Applicant assessment

1. In line with the description provided within her initial independent consultancy application, Dame Jenny's consulting work on a wide range of public health areas including population health, health protection, international health and health economics.
2. CSL Seqirus is a global leader in influenza vaccines and a key business of the larger biotechnology company. Dame Jenny stated her work with CSL Seqirus will involve joining an expert global panel on a range of topics impacting public health. She stated she will describe, coordinate, and implement efforts to improve public health through vaccinations, full value chain analysis and application, and supporting discussions on possible approaches to pandemic preparedness both domestically and internationally.
3. Dame Jenny's work with CSL Seqirus will not involve lobbying of ministers in areas where she had relevant senior civil service experience or information, nor involvement in government bids and contracts on behalf of the company.
4. After leaving the civil service, Dame Jenny stated that initial contact with CSL Seqirus was made in late July 2025. No discussions about this work took place while she was still in government. She said she had detailed discussions regarding potential work in September 2025, which involved considering areas of work deemed appropriate or contrary to the Rules.
5. As Chief Executive of UKHSA, Dame Jenny was responsible for leading the agency. She was accountable for its strategy, operations and the effective and efficient use of public funds. As part of this role, she had broad oversight of decisions impacting the biotechnology and life sciences sectors as well as various engagements with wider science communities. With regards to CSL Seqirus, this involved having broad oversight of personnel responsible for vaccine contracts, such as the advanced purchase agreement for the pandemic flu H5 (avian flu) vaccine. She had infrequent official contact with CSL Seqirus occurring a maximum of three to four times a year focused solely on professional and technical considerations for pandemic products, as well as a single site visit to the CSL Seqirus plant in Speke to challenge and assure the supply chain for pandemic products. She stated her official dealings with the wider biotechnology and life sciences sector were mainly high-level, non-specific to CSL Seqirus and focused on general industry developments, involving her representation of UKHSA at various science and vaccine conferences, and broad participation in discussions on bioindustry developments.

6. Despite her high-level role, Dame Jenny stated her direct involvement in commercial contracting was strictly limited. She stated that she did not routinely know the specific contract values for commercial decisions and could not initiate or sign off any vaccine contract, as the decision and funding were provided by DHSC and ultimately signed off by ministers. The actual contracting, including all costs and commercial terms, was delegated to the relevant Senior Responsible Officer and Commercial Director. Furthermore, she said that while her job required her to provide advice on all vaccines of potential public health benefit, policy decisions were made by ministers based on advice from the Joint Committee on Vaccination and Immunisation and input from DHSC, ensuring a separation from commercial activity. She also added that held no unaccompanied meetings with any representatives of CSL Seqirus or any other company throughout her time as a senior civil servant.

Departmental assessment

7. The Cabinet Office and DHSC confirmed that UKHSA and CSL Seqirus have multiple major contractual agreements and partnerships. The departments also confirmed Dame Jenny's official dealings with the company, its competitors, and the wider biotechnology and life sciences sector during her time in the civil service, as she detailed in her application. This included involvement in an advance purchase agreement for the standby capability to produce 100 million influenza vaccines to tackle the pandemic flu H5 (avian flu) at CSL Seqirus's Liverpool plant². The departments noted that while Dame Jenny's professional dealings with CSL Seqirus carry a risk of being perceived as a reward for past favours, this risk is mitigated by the fact that large financial agreements are subject to specific commercial protocols, in which she had no involvement. Further, DHSC stated there is no evidence to suggest that any prior decisions were made in expectation of this consulting work.
8. In line with the description provided by the departments from her independent consultancy advice, the Cabinet Office and DHSC stated that Dame Jenny had access to commercially sensitive information, though the departments are satisfied that this information is no longer relevant or nearly so, given that more than six months have passed since she left the role.
9. The departments noted Dame Jenny's prior and long-standing background in clinical, academic, and public health prior to her recent role in the civil service.

² UK Health Security Agency, 'UKHSA announces new UK-based vaccine deal': <https://www.gov.uk/government/news/ukhsa-announces-new-uk-based-vaccine-deal#:~:text=The%20deal%20is%20set%20to,Chief%20Executive%20of%20UKHSA%20%2C%20said:>

10. The departments did not have concerns with her work with CSL Seqirus and recommended the standard conditions.

CSC analysis

11. *Risk of reward.* Given Dame Jenny's seniority and broad involvement in strategic decisions affecting the biotechnology and life sciences sector, including high-level oversight of an advance purchase agreement of the pandemic flu vaccine with CSL Seqirus, there is a perception that the commission could have come as a result of an unfair advantage or a reward for actions taken in post. However, Dame Jenny and the departments confirmed her role precluded direct involvement in commercial contracts, funding, or specific policy decisions, which were held by other senior officials and ministers. The Commission agreed with the department's view that the risk that she was offered the commission with CSL Seqirus as a reward for decisions or actions taken in office is low.

12. *Access to information.* Dame Jenny will have had access to a wide range of information on developments relating to biotechnology and related scientific fields which could provide an unfair advantage to CSL Seqirus. This risk is reduced by the time passed since leaving government service (over six months) 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 work with 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. Dame Jenny had no direct involvement in this work.
- The government has now published 'The UK's Modern Industrial Strategy 2025'³ which sets out its ten year plan and places the government's high-level priorities for the Life Sciences in the public domain. The government has also published the Autumn Budget 2025⁴, placing key strategic information on DHSC and UKHSA priorities, including funding, in the public domain.

³ Department for Business and Trade, 'UK Modern Industrial Strategy 2025': <https://www.gov.uk/government/collections/the-uks-modern-industrial-strategy-2025>.

⁴ HM Treasury, 'Budget 2025': <https://www.gov.uk/government/publications/budget-2025-document/budget-2025-html>.

13. *Improper influence.* As a senior official, there is a risk that Dame Jenny's government contacts may present an unfair advantage to CSL Seqirus. 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 standard conditions mitigate risks in relation to her work with CSL Seqirus.
14. *Return to Commission.* Dame Jenny has submitted a request to the Commission for approval of her work with CSL Seqirus. This is in accordance with the condition of her initial independent consultancy requiring approval for each new piece of work. 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 her initial independent consultancy will still apply.
15. *Waiting period.* As noted in her approval to establish her independent consultancy, 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. As Dame Jenny left the civil service over six months ago, this period has elapsed.