



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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**BUSINESS APPOINTMENT APPLICATION: The Lord Mark Sedwill KCMG, Westbury Partners Ltd.**

1. The Committee has been asked to consider an application for Lord Mark Sedwill, former Cabinet Secretary (April 2018 - September 2020) and former National Security Advisor (April 2017- September 2020). His last day in Crown Service was 30 September 2020.

Appointment Details

2. Lord Sedwill sought the Committee's advice on taking up a paid part-time role, with Westbury Partners Ltd (WPL), as a Consultant Advisor. Lord Sedwill said WPL, a private limited company, offers confidential strategic advice to CEOs/ Chairman on non-operational matters. WPL says it provides corporate leaders with private support through its '*... uniquely combined experience, insight and judgement*'. It has several blue-chip clients<sup>1</sup> in the international investment, insurance and financial services sectors from the UK, US, Japan and Singapore (including Temasek, the Singapore sovereign investment fund), plus a British global consumer electronics firm. It offers insight and experienced judgement in support of strategy and decisions in areas that include:
  - ESG (Environmental, social and corporate governance)
  - Geopolitical trends
  - Social and technological trends
  - Engagement with external stakeholders
  - People management and succession planning
3. Lord Sedwill also said WPL works to prepare selected candidates for C-Suite (C-level executive) responsibilities by providing insight, advice and an independent, confidential sounding board on issues broader than those they

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<sup>1</sup> This category of companies generally sells high-quality and widely accepted products and services to a large customer base. The term is used to define companies that are the top 100 largest companies.

have to date encountered. The company does not engage in lobbying governments and said WPL's current clients do not provide services to HMG.

4. Lord Sedwill said his role will be to assist WPL to deliver confidential strategic advisory services to its clients, via Chairs and CEO's, on:
  - Strategic leadership of complex organisations: executive mentoring, adaptive leadership, stakeholder and reputation management, ESG investing, regulatory environment, succession planning, communications;
  - Operating Environment: insight (from open source information) into the global political, economic and business environment.
5. He stated this is a non-executive role and his role will not involve contact with the Government. He also confirmed he will not advise on commercial interactions WPL's current or future clients might have with HMG.
6. Lord Sedwill advised the Committee he did not meet with WPL whilst in office and his former Department, Cabinet Office has no relationship with WPL. He also told the Committee he did not have any involvement in any relevant policy development or decisions that would have affected WPL and no commercial or contractual responsibilities relating to WPL. Further, he did not meet with competitors of WPL; nor did he have access to sensitive information regarding these competitors.
7. The Cabinet Office confirmed the details provided by Lord Sedwill and confirmed he had no access to specific, policy or other departmental information. However, it did inform the Committee given the seniority of the Lord Sedwill's role, conditions limiting lobbying and the sharing of privileged information would seem appropriate.

### The Committee's Consideration

8. When considering this application, the Committee<sup>2</sup> noted that Lord Sedwill did not meet with WPL during his time in service and did he make any decisions directly affecting WPL. Therefore, the Committee considered there is no reason it might be perceived this appointment is a reward for decisions made or actions taken from his time in office.
9. As the former Cabinet Secretary and National Security Advisor, the Committee noted he would have had access to privileged information which may be seen to be of general use to any company he chooses to join. Specifically the Committee noted due to his role he would have access to sensitive information regarding the Government's planning around the impact of the UK's departure from the EU. The Committee recognised any company operating in the UK and internationally may be considered to be gaining from his insight unavailable to its competitors (such as insight into possible approaches to future trade agreements). However, the Committee considered the level of information seen by Lord Sedwill would likely have been high level

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<sup>2</sup> This application for advice was considered by Sir Alex Allan; Jonathan Baume; Mike Weir; Lord Larry Whitty; John Wood; The Rt Hon, Lord Eric Pickles; Dr Susan Liautaud and Richard Thomas.

and not specific to a particular company. Further, the Committee noted Lord Sedwill left office before the UK's departure and 5 months have now passed since he had access to information (5 months). The Committee would draw Lord Sedwill's attention to the restriction on using privileged information imposed below. The Committee considered that in this context he should specifically avoid giving his new employer privileged insight into the UK's negotiating strategy post its departure from the EU.

10. Additionally, the Committee noted due to Lord Sedwill's seniority and influence at the centre of the Government, there is a risk it could be perceived his network and influence might assist WPL unfairly. The Committee would draw Lord Sedwill's attention to the lobbying restriction and the restriction on providing advice on the terms of a bid or contract relating directly to the work of the UK Government imposed below. These conditions will prevent him from providing an unfair advantage to WPL in respect to his contacts across the Government. However, the Committee noted this was in keeping with his role as described.
11. The Committee also noted that WPL's potential clients are unknown. It is possible that he may be asked to advise clients who were affected by matters of policy that relate to policy areas he had direct involvement in. Therefore, the Committee imposed a specific condition on this appointment which makes clear that in working with WPL, Lord Sedwill should not advise WPL or its clients on work with regard to any policy he had specific involvement or responsibility for as Cabinet Secretary and/or National Security Advisor.
12. The Prime Minister, under the Government's Business Appointment Rules, has accepted the Committee's advice that Lord Sedwill's role with **Westbury Partners Ltd** should be subject to the following 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. In the context of this general provision, the Committee considers he should specifically avoid giving Westbury Partners Ltd or its subsidiaries, partners or clients, privileged insight based on information from his time in Crown service into Brexit related issues, insofar as it as it pertains to UK's negotiating strategy post its departure from the EU;
  - for two years from his last day in Crown service, he should not become personally involved in lobbying the UK Government on behalf of Westbury Partners Ltd (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the Government and/or ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage Westbury Partners Ltd (including parent companies, subsidiaries, partners and clients);
  - for two years from his last day in Crown service, he should not provide advice to Westbury Partners Ltd (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; and

- for two years from his last day in Crown service, he should not advise Westbury Partners Ltd (including parent companies, subsidiaries, partners and clients) on work with regard to any policy he had specific involvement or responsibility for as Cabinet Secretary or National Security Advisor, or where he had a relationship with the company or organisation during his time as Cabinet Secretary or National Security Advisor.
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. I should be grateful if you would inform us as soon as Lord Sedwill takes up employment with this organisation, or if it is announced that Lord Sedwill will do so, either by returning the enclosed form or by emailing the office at the above address. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments that have not been taken up or announced. This could lead to a false assumption being made about whether Lord Sedwill has complied with the Rules.
  16. Please also inform us if Lord Sedwill proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him to make a fresh application.
  17. 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.

Yours Sincerely,

Isabella Wynn  
**Committee Secretariat**

