



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

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**BUSINESS APPOINTMENT APPLICATION: Sir Alexander William Younger KCMG, Recorded Future, under his consultancy, the Safa Partnership.**

1. Sir Alex Younger, former Chief of the Secret Intelligence Service (SIS), sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former Crown servants (the Rules) on an appointment he wishes to take up, under his independent consultancy, with Recorded Future (Recorded). The material information taken into consideration by the Committee is set out in the annex.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during Sir Alex's time in office, alongside the information and influence a former Crown servant may offer Recorded.
3. The Committee considered whether this appointment was unsuitable given that in Sir Alex's former role as Chief of the SIS, he had broad access to information affecting all sectors. However, the Committee must also consider the information provided by the departments. The Committee has advised that a number of conditions be imposed to mitigate the potential risks to the government associated with this appointment under the Rules; this does not imply the Committee has taken a view on the appropriateness of this appointment for a former Chief of the SIS in any other respect.
4. The Rules set out that Crown servants must abide by the Committee's advice<sup>1</sup>. 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.

The Committee's Consideration of the risks presented

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<sup>1</sup> Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The Queen's Regulations and the Diplomatic Service Code

5. The Committee<sup>2</sup> considered this commission to be consistent with the description of Sir Alex's consultancy, the Safa Partnership, which he said '*will provide advice focused on geo-political risk, cyber and digital leadership*'.
6. Recorded is a cybersecurity company founded in 2009 with headquarters in Somerville, Massachusetts. The Committee noted that Sir Alex did not meet with Recorded during his time in service and there is no relationship between Recorded, SIS, or the Foreign, Commonwealth and Development Office (FCDO). As such, 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.
7. As the former Chief of the SIS, the Committee noted he would have had access to a range of particularly sensitive information, including that which relates to geopolitics, international risk and cyber. As a result it could be perceived he could offer Recorded an unfair advantage in providing advice in this area. This could give Recorded an unfair insight into the cyber/technology sector.
8. The Committee also noted due to Sir Alex's seniority and influence in government, there is a risk it could be perceived his network and influence might assist Recorded unfairly. The Committee would draw Sir Alex'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 Recorded in respect to his contacts across the government. However, the Committee noted this was in keeping with his role as described.

#### The Committee's advice

9. The Committee noted the department's confirmation that Sir Alex is bound by the Official Secrets Act and 9 months have passed since he was in office. Further he is subject to the below standard privileged information ban. As such, whilst Recorded will undoubtedly gain from his profile, his skills and experience in the sector, the risk he could use sensitive information to unfairly benefit Recorded are mitigated.
10. The Committee advises, under the government's Business Appointment Rules, that this appointment, with **Recorded Futures** should be subject to the same conditions which apply to his independent consultancy:
  - 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;
  - for two years from his last day in Crown service, he should not become personally involved in lobbying the UK government or any of its Arm's Length

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<sup>2</sup> This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Sarah de Gay; Isabel Doverty; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir; Lord Larry Whitty and Dr Susan Liataud.

Bodies on behalf of those he advises under his independent consultancy (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage those he advises under his independent consultancy (including parent companies, subsidiaries, partners and clients);

- for two years from his last day in Crown service, he should not provide advice to on behalf of those he advises under his independent consultancy (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 his last day in Crown service, he should not become personally involved in lobbying contacts he has developed during his time in office and in other governments and organisations for the purpose of securing business for any company or organisation (including parent companies, subsidiaries and partners); and
  - for two years from his last day in Crown service, before accepting any commissions for his independent consultancy and or/before extending or otherwise changing the nature of his commissions, he should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.
11. 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.
12. 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.*"
13. I should be grateful if you would inform us as soon as Sir Alex takes up employment with this organisation, or if it is announced that Sir Alex 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 Sir Alex has complied with the Rules.

14. Please also inform us if Sir Alex 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.
15. 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**

### **Annex - Material information**

#### The role

1. Sir Alex states Recorded is a privately owned US tech company. Its website states it is a cybersecurity company founded in 2009 with headquarters in Somerville, Massachusetts. The company specializes in the collection, processing, analysis, and dissemination of threat intelligence. It states it organises and analysis threat data in a new and different way that is '...better, faster security'. It states it provides security teams the information they need to exponentially amplify the power of their security programs.
2. He said he will be a Non-Executive Board Member and he will be advising on geopolitical risk and opportunity worldwide. He stated this role will not involve contact with government.

#### Dealings in office

3. Sir Alex advised the Committee he did not meet with Recorded while in service and there is no relationship between SIS and Recorded. As such was not involved in any commercial or contractual decisions relating to Recorded. He also told the Committee he did not have any involvement in any relevant policy development or decisions that would specifically affect Recorded and did not meet with its competitors; nor did he have access to sensitive information regarding these competitors.

#### Department Assessment

4. The SIS, FCDO and the Cabinet Office all confirmed the details provided by Sir Alex. The SIS and FCDO confirmed by definition Sir Alex has in the past had access to privileged information relating to issues across the world. However, it confirmed Sir Alex remains bound by the Official Secrets Act.

5. The SIS said it seems likely that as Chief of the SIS he might have responsibility for matters that might be perceived to have an impact on the geopolitical landscape and in particular perhaps the tech/cyber sector. However, the FDCO stated it was not aware of anything with direct impact, although Sir Alex will have been involved in wider discussions about security, cyber, and foreign policy.
6. All departments confirmed they had no concerns with this appointment and recommended the standard conditions apply.