



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

Room G/08, 1 Horse Guards Road, London, SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

August 2023

BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: Elizabeth Sizeland, former Deputy National Security Adviser and Prime Minister's Adviser on National Resilience and Security in the Cabinet Office. An unpaid appointment with the Atlantic Council.

1. Ms Sizeland 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 an unpaid role she wishes to take up with the Atlantic Council.
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 made during Ms Sizeland's time in office, alongside the information and influence a former Crown servant may offer the Atlantic Council. 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 Rules¹ set out that Crown servants must abide by the Committee's advice. 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

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

5. When considering this application, the Committee² took into account this appointment as Non-Resident Senior Fellow is unpaid³. Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of government by considering the real and perceived risks associated with former ministers joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions or take action in office to in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. Though this work has a general overlap with her area of work and expertise in office (security and resilience) her former department confirmed she did not make any decisions specific to the Atlantic Council, nor have any specific information the department was concerned about.

The Committee's advice

7. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. Whilst there are inherent risks associated with Ms Sizeland's access to sensitive information and contacts, the standard conditions below, which seek to prevent her from drawing on her privileged information and using her contacts to the unfair advantage of her new employer, will sufficiently mitigate in this case.
8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **Atlantic Council** be subject to the following 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 should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of the Atlantic Council (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage the Atlantic Council (including parent companies, subsidiaries, partners and clients);
 - for two years from her last day in Crown service she should not provide

² This application for advice was considered by Andrew Cumpsty; Jonathan Baume; Sarah de Gay; Isabel Doverty; Dr Susan Liautaud; Richard Thomas; The Rt Hon Lord Pickles and Mike Weir.

³By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

advice to the Atlantic Council on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of the UK government or any of its arm's length bodies.

9. The advice and the conditions under the government's Business Appointment Rules relate to her previous role in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. 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.
10. 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.
11. 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.*"
12. Ms Sizeland 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.
13. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Hamzah Rizvi
Committee Secretariat

Annex - Material information

The role

1. Ms Sizeland stated she will be working in an unpaid role as Non-Resident Senior Fellow at the Atlantic Council. Ms Sizeland stated her role will not involve contact with government
2. Ms Sizeland described the Atlantic Council as ideas and policy development on national security issues. Its website states it is an American think tank in the field of international affairs, favouring Atlanticism⁴, founded in 1961. It manages sixteen regional centres and functional programs related to international security and global economic prosperity. It is headquartered in Washington, D.C.
3. Ms Sizeland said the offer arose from conversations with think tanks across Washington DC, about working in areas of mutual interest which could include resilience, state threat, national security structures, etc.

Dealings in office

4. Ms Sizeland advised the Committee that she met with the Atlantic Council during her time as Joint Intelligence Council (JIO) Attache and previously in her capacity as Deputy National Security Adviser, where she spoke at a forum on State Threat. However, she stated she was not involved in any impact on policy or regulatory decisions specific to the Atlantic Council.

Departmental Assessment

5. GCHQ confirmed the details Ms Sizeland provided in her applications and confirmed that:
 - she did not make any policy or regulatory decisions specific to the Atlantic Council;
 - it does not have a departmental relationship with the Atlantic Council;
 - it did not have concerns regarding her access to sensitive information, noting she remains governed by the Official Secrets Act⁵; and
 - it did not have any concerns with the appointment.

⁴ Atlanticism, also known as Transatlanticism, is the ideological belief in support of closer relationships between the peoples and governments in Northern America (the United States and Canada) and in Europe (the countries of the European Union, the United Kingdom, Ukraine, Switzerland, Norway, Iceland, Turkey etc.)

⁵ An Official Secrets Act is legislation that provides for the protection of state secrets and official information, mainly related to national security.