



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Elizabeth Sizeland, former Attache for the Joint Intelligence Organisation at the UK Embassy in Washington DC USA. Paid commission with Beacon Global Strategies LLC under your independent consultancy.

1. You 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 taking up a role with Beacon Global Strategies LLC (BGS) under your independent consultancy.
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 your time in office, alongside the information and influence you may offer your clients. 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

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. The Committee² considered this commission to be consistent with the description of your consultancy - providing advice on management of crises, organisational risks, leadership and governance; advice on dramatic realism/concept development for television and film; teaching, and writing (op-ed and non-fiction/fiction).
6. You seek to work for BGS, a national security advisory firm that helps international, public and private clients navigate the challenges in geopolitical risks, defence and national security policy, global technology policy, in multiple sectors, to drive growth. This commission is related to your time in office insofar as it concerns security, risk management and other similar matters.
7. You did not meet with BGS, nor were you involved in any decisions specific to them while you were in office. Therefore, the Committee considered there is limited risk that this commission can reasonably be perceived as a reward for decisions made in office.
8. The Committee noted that as a former Joint Intelligence Organisation attache there is a risk you could have access to relevant privileged information and knowledge which could unfairly benefit BGS. This risk is limited given that the overlap is broad in nature and your former department is not aware of any specific knowledge that you had access to that could give BGS an unfair advantage. Further, it has been five months since you left office, reducing the likelihood that your knowledge is sufficiently up to date.
9. This risk in relation to your access to information is most likely to arise if there was a direct overlap in the advice BGS asks you to provide and your former role. Given the unknown nature of BGS' clients, there is a risk that a client or piece of work may relate to your time in office.
10. As an attache, your role involved building a network of contacts. The Committee considered that there is a risk that your contacts within the UK and internationally could offer unfair BGS and its clients unfair access and influence within government.

The Committee's advice

11. The Committee considered the conditions attached to your consultancy to help to mitigate the majority of the risks associated with your access to privileged insight and contacts. These seek to prevent you from unfairly advantaging BGS

² This application for advice was considered by Andrew Cumpsty, Isabel Doverty, Sarah de Gay, the Baroness Jones of Whitchurch; The Rt Hon the Lord Pickles; and Mike Weir.

and its clients as a result of the influence you may offer; and/or making improper use of access to information and contacts from your time in government service.

12. There remain unknown risks that you may offer insight and influence, gained from your time in office, to BGS' unknown client base. The Committee considered it appropriate to impose an additional condition to prevent you from advising BGS or its clients on matters you had specific involvement with while in office.

13. Under the government's Business Appointment Rules, the Committee has advised that this Commission with **Beacon Global Strategies LLC** should be subject to the same conditions applied to your independent consultancy in addition to imposing an additional condition as follows:

- you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from her time in Crown service;
- for two years from your last day in Crown service, you should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of those you advise under your independent consultancy (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage Beacon Global Strategies (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in Crown service, you should not provide advice to on behalf of Beacon Global Strategies (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 your last day in Crown service, you should not become personally involved in lobbying contacts you have developed during your time in office and in other governments and organisations for the purpose of securing business for your independent consultancy;
- for two years from your last day in office, you should not advise BGS or its clients on any work with regard to any policy or operational matter you had a material role in developing or determining as JIO attache and deputy national security adviser, or where you had a relationship with the relevant client during your time as attache and security adviser;

- for two years from your last day of Crown service, before accepting any commissions and/or before changing the nature of the consultancy, you should make an application to the Committee. This condition does not apply to work in academia, writing for publication, or advising on dramatic realism of security themes in film and television/concept development - consistent with the description provided in your application. Should any commission fall outside of that description you would need to seek advice from the Committee;

Additionally for this commission with Beacon Global Strategies LLC, the Committee has imposed the following condition:

- for two years from your last day in office, you should not advise BGS or its clients on any work with regard to any policy or operational matter you had a material role in developing or determining as JIO attache and deputy national security adviser, or where you had a relationship with the relevant client during your time as attache and security adviser.

14. The advice and the conditions under the government's Business Appointment Rules relate to your previous role in government only; there are separate rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Commissioner for Standards³. 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.

15. 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.

16. 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.*"

³ All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers

17. You must inform us as soon as your commission is live or is announced. You must also inform us if you propose to extend or otherwise change the nature of your consultancy as, depending on the circumstances, it may be necessary for you to make a fresh application.
18. 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

Shaneez Mithani
Committee Secretariat

Annex - Material information

Commission with Beacon Global Strategies

1. You said that in this commission you have been asked to use your crisis expertise and experience to advise the senior team at BGS on:
 - Crisis management;
 - National security strategy development;
 - Governance.
2. You said that this role will not be client-facing and that you will be advising the senior team in BGS only and that you will explicitly not draw on any privileged information; and it will not involve any dealings or contact with the UK government.
3. You stated that:
 - that you had no dealings, contractual or otherwise, with BGS or any of their competitors while in office;
 - you had no access to commercially sensitive information about BGS or its competitors;
 - you had an exploratory conversation with BGS regarding your restrictions under the Rules and Official Secrets Act and are confident that BGS's expectations are in line with the guidelines set out under these frameworks.

Department assessment

4. Your former department, GCHQ, confirmed the details in your application and said:
 - there is no specific departmental relationship with BGS, and you have made no decisions in office specific to this commission.
 - you have broad experience in national security that gives you insights into the issues on which BGS requires advice.
 - it does not have any concerns regarding your access to privileged information that could give BGS an unfair advantage; nor does it have concerns about unfair influence, risk of reward or national security risks.
5. GCHQ said that there is no obvious risk with this commission and recommended that this commission be subject to the standard conditions.