



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Katrina Jane Williams CB, former - Director-General International and Borders, Department for Environment, Food and Rural Affairs (Defra). Paid application to join the Centre for Political and Diplomatic Studies.

1. Ms Williams 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 the Centre for Political and Diplomatic Studies (CPDS) as a Consultant - Course Director.
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 Williams' time in office, alongside the information and influence she may offer CPDS. 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 Rules set out that Crown servants must abide by the Committee's advice¹. 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

5. Ms Williams did not meet with CDPS, nor did she make any decisions specific to the organisation during her time as Director-General at Defra. Therefore,

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

the Committee² considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.

6. This appointment has a general overlap with Ms Williams' time at Defra in relation to international policy development and negotiations. . However, the risks associated with her access to sensitive information is limited given that:
 - The nature of the role is focussed on training and development - general skills and expertise, rather than specific delivery or influence on policy development/ negotiations
 - Defra confirmed she does not have access to sensitive information specific to CDPS
 - It has been 8 months since she left government.
7. Ms Williams may deliver training courses to participants from government departments. The Committee recognised this is possible whilst using his general knowledge, skills and experience and would not rely on privileged insight, which she is prevented from making use of. As any government officials participating would be doing so at the request of government departments, this contact with officials would be consistent with the Committee's advice and the conditions below.
8. There is a risk associated with Ms Williams potential influence via her contacts within government. Particularly in relation to securing future business for the company, as she could be perceived to offer CPDS an unfair advantage.

The Committee's advice

9. 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 Williams' access to sensitive information and contacts, the standard conditions below, which seek to prevent her from drawing on her privileged information and contacts to the unfair advantage of her new employer, will sufficiently mitigate the risks in this case.
10. Taking these factors into account, in accordance with the government's Business Appointment Rules, the Committee's advice is this appointment with the **Centre for Political and Diplomatic Studies** be subject to the following conditions:

² This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Sarah de Gay; The Rt Hon Lord Eric Pickles and Mike Weir. Jonathan Baume, Richard Thomas and The Rt Hon Baroness Jones of Whitchurch were unavailable.

- 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 Centre for Political and Diplomatic Studies (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 Centre for Political and Diplomatic Studies (including parent companies, subsidiaries, partners and clients);
 - for two years from her last day in Crown service she should not provide advice to the Centre for Political and Diplomatic Studies 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.
11. 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.
 12. 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.
 13. 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."*
 14. Ms Williams 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.
 15. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Annex - Material Information

The role

1. Ms Williams stated that the CPDS provides training world-wide on international policy and in international negotiating practices and skills. It does this through consultants who have been practitioners in negotiations (mostly former civil servants or public servants). The company's website says it provides bespoke training, drawing on a global network of expert leaders with decades of hands-on experience. CPDS trains diplomats, civil servants, corporate executives and politicians from organisations and companies around the world.
2. In her paid, part-time role as Consultant - Course Director, Ms Williams stated she will deliver training to groups of individuals, including civil servants and public servants in the UK and in overseas administrations and in businesses. The role will also include some work in developing training modules to suit the needs of specific clients.
3. She added that CPDS has contracts to deliver training in international negotiating skills to a number of UK government departments and may acquire new contracts, including potentially with Defra. She would not be directly involved in canvassing this new business: her role would be focused on the development and delivery of training materials
4. Ms Williams stated that the expertise for which she would be contracted in this role dates principally from her time in Brussels in 2017-2020 and earlier postings. Her most recent role there involved negotiating legislation on behalf of the UK whilst it was a member of the EU.

Dealings in office

5. Ms Williams advised the Committee that she did not meet with CDPS in office; nor did she make any decisions specific to CDPS. Further, she said she had had no access to sensitive information specific to the organisation.

Departmental Assessment

6. Defra confirmed the details Ms Williams provided and added that:
 - It does not currently have a departmental relationship with CDPS, but that there was previously some spending between 2018-2022 (to the value of £169,300).
 - There are many examples of former Civil Servants teaching similar courses and it is desirable that practical expertise is used to inform curriculums for policy-makers and negotiators.

- The department considered Ms Williams' ongoing duty of confidentiality should be sufficient mitigation regarding any access to sensitive information.
- It did not have concerns with the appointment and recommended the standard conditions.