



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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October 2023

BUSINESS APPOINTMENT APPLICATION: Katrina Jane Williams CB, former - Director-General International and Borders, Department for Environment, Food and Rural Affairs. Paid appointment with Rud Pedersen Public Affairs Brussels SRL.

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 Rud Pedersen Public Affairs Brussels SRL (Rud Pedersen) as a Senior Advisor.
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's time in office, alongside the information and influence she may offer Rud Pedersen. 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. In Ms Williams' most recent roles with the Scottish Government and the Department for Environment, Food and Rural Affairs (Defra) Ms Williams had no official dealings with Rud Pedersen. During her time in post at the Foreign, Commonwealth and Development Office (FCDO), Ms Williams met with Rud Pedersen and other public affairs companies in Brussels. The departments

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

confirmed she was not involved in any policy or regulatory decisions specific to Rud Pedersen - and these meetings offered no preferential treatment. The Committee² considered the risk this appointment could be perceived as a reward for decisions or actions taken in office is low.

6. There is a broad overlap with this appointment and Ms Williams' time in government given she had involvement in matters relating to international policy and negotiations in the EU. This role with Rud Pedersen is focussed on the institutions and legislation of the EU. However, there a number of mitigations regarding Ms William's access to sensitive information:
 - It has been almost three years since her time at FCDO and FCDO consider any information she was in possession of has significantly devalued in currency
 - It has been eight months since she left Defra, also placing a significant gap between her last having any access to information and taking up this role, helping to reduce the risk it is sufficiently up to date to provide an advantage
 - The departments are not aware of any sensitive information she may have had access to that would provide an unfair advantage to the company
7. The Committee noted there is a risk associated in joining an organisation that may lobby the UK government on behalf of clients - which all former senior civil servants are prevented from doing for 2 years on leaving office. As the former Director-General International and Borders and before that, UK Deputy Ambassador to the European Union, Ms Williams will also have gained contacts internationally. As noted by the FCDO, there is a risk her network and influence gained in office might be used to assist Rud Pedersen unfairly. This is consistent with the description of Ms Willaims' role which will not include lobbying with the EU institutions or the UK government.
8. There are risks related to Rud Pedersen's unknown clients - should Ms Williams advise clients she had contact with during government, or if she were to advise on matters she had specific involvement in during her most recent role(s) in government would raise risks under the Rules.
9. It is also significant that Rud Pedersen confirmed that Ms Willaims will not be involved in lobbying at either national or EU level, it will abide by the conditions imposed and ensure that all relevant members of the team are aware of the restrictions. *abide by the conditions...We will ensure that all relevant members of our team are aware of the restrictions placed upon Ms. Williams, as we have done with similar restrictions placed upon our other Senior Advisors by the EU institutions'.*

The Committee's advice

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

10. Ms Williams confirmed there will be no lobbying of the government in this role, in line with the expectations set out in the Rules. However, there is a risk she could be seen to be offering Rud Pedersen unfair access and influence in this role. The Committee's advice is therefore that Ms Williams should have no direct engagement with the UK government on behalf of Rud Pedersen, for the avoidance of doubt this includes UK Mission to the European Union as an arm's length body of government. The Committee also advises that she must not be involved in any work Rud Pedersen may seek to take up with the government, whether commercial bids for work, or for funding.
11. To address the risk associated with Rud Pedersen's unknown clients, the Committee considered it necessary to impose a further condition. This makes it clear that in working with the company, Ms Williams should not advise on work with regard to any policy she had specific involvement in or responsibility for during her time as Director-General International and Borders and Director-General External Affairs nor where she had a relationship with the relevant client during her time in post.
12. The Committee considered the conditions below will sufficiently mitigate the risks in this case. These seek to prevent Ms Williams from drawing on her privileged information, contacts and influence gained in Crown service to the unfair advantage of Rud Pedersen.
13. Taking these factors into account, in accordance with the government's Business Appointment Rules, the Committee's advice is this appointment with **Rud Pedersen Public Affairs Brussels SRL** be subject to the following conditions:
 - Ms Williams 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, Ms Williams should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of Rud Pedersen Public Affairs Brussels SRL (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage Rud Pedersen Public Affairs Brussels SRL (including parent companies, subsidiaries, partners and clients);
 - for two years from her last day in Crown service, Ms Williams should not undertake any work with Rud Pedersen Public Affairs Brussels SRL (including parent companies, subsidiaries, partners and clients) that involves providing advice 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 its arm's length bodies;
 - for two years from her last day in Crown service, Ms Williams should not have any engagement on behalf of Rud Pedersen Public Affairs Brussels SRL

(including parent companies, subsidiaries, partners and clients) with the UK Government;

- for two years from her last day in Crown service, Ms Williams should not advise Rud Pedersen Public Affairs Brussels SRL or its clients on any work with regard to any policy she had specific involvement in or responsibility for as Director-General International and Borders and Director-General External Affairs, nor where she had a relationship with the relevant business during her time as Director-General International and Borders and Director-General External Affairs; and
- for two years from her last day in Crown service, Ms Williams should not become personally involved in lobbying contacts she has developed during her time in office and in other governments and organisations for the purpose of securing business for Rud Pedersen Public Affairs Brussels SRL (including parent companies, subsidiaries and partners).

14. 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.

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 Ministerial Code/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.*"

17. 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.

18. 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. Rud Pedersen Public Affairs Brussels SRL is a public relations and communications firm. Rud Pedersen Public Affairs Brussels SRL is the Belgian-based subsidiary of the group company Rud Peterson Public Affairs AB in Stockholm (The Rud Pedersen Group consists of 8 brands specialising in public affairs, public relations, strategic communication, marketing and headhunting). The company offers the following services:
 - Advocacy
 - Crisis Management
 - Issue Management
 - Market Access
 - Political Festival Engagement
 - Political Risk Assessment
 - Public Affairs Training
 - Stakeholder Engagement
 - Strategic Communication
 - Tender Management
2. In her paid, part-time role as Senior Advisor, Ms Williams stated her role will be providing advice to the staff of Rud Pedersen and to its clients on how best to influence the institutions and legislation of the European Union. She added that her particular focus would be advising on how to influence the Council of the European Union, drawing on her experience as UK Deputy Permanent Representative to the EU (which she left in October 2020), and focusing on those microeconomic areas for which she was responsible as Deputy Permanent Representative. She added that this is not a lobbying role. She would not be engaged in lobbying the UK government or the institutions of the EU.
3. Ms Williams said she was approached by Rud Pedersen after her retirement in January 2023 as a person whose past experience and skills would enhance their understanding and that of their clients of the EU.
4. Rud Pedersen confirmed to ACOBA that: *'We believe that our clients are their own best advocates. As such we do not expect Ms. Williams, nor any of our other Senior Advisors in Brussels, to personally lobby governmental actors at EU or national level (including third countries) on behalf of our clients or their interests...We are happy to abide by the conditions stated below. We will ensure that all relevant members of our team are aware of the restrictions placed upon Ms. Williams, as we have done with similar restrictions placed upon our other Senior Advisors by the EU institutions'.*

5. The company also added that it abides by the terms of the European Public Affairs Consultancies Code of Conduct³ - and are as such, subject to the European Transparency Register⁴. As such, interested parties can find details of its current clients in the public domain.

Dealings in office

6. Ms Williams advised the Committee that during her time at the FCDO (which ended in October 2020) that as the UK was leaving the EU, Rud Pedersen was one of a number of Brussels-based consultancies she met with that were interested in the question of how influencing the EU would change for the UK Government and for business post-Brexit. In that context, Rud Pedersen organised a number (3 over a period of 3 years) of events which she attended involving Brussels-based Trade Associations and offices. She added that she had fairly regular, but one-off discussions with representatives of most of the public affairs companies in Brussels.
7. Ms Williams stated she has not had any official dealings with Rud Pedersen or its competitors since leaving Brussels in October 2020: neither her posting in the Scottish Government nor in Defra entailed contact with Rud Pedersen; nor was she involved in any policy or regulatory decisions specific to the company.

Departmental Assessment

8. The FCDO and Defra confirmed Ms Williams was not involved in any policy or regulatory decisions specific to Rud Pedersen during her time in post, nor do the respective departments have a relationship with the company.
9. The departments confirmed Ms Williams' contact with Rud Pedersen was limited. FCDO added that she also met with representatives of most of the Public Affairs companies in Brussels during her time there - so it could not be argued that she was providing preferential treatment to one company.
10. The FCDO and Defra did not have concerns regarding Ms Williams' access to information. The FCDO stated it does not see any conflict of interest issues arising given the nature of the role and the length of time since Ms Williams worked at the department.
11. The FCDO said it was significant that as part of her role, Ms Williams committed not to lobby UK officials, nor EU officials directly - wherein she is providing advice on influencing the EU to clients. The department added that whilst this is not a lobbying role, the advice could be strengthened if Ms Williams is prevented from reaching out to former colleagues in Europe (who have likely changed since she moved on from her time in the department).

³ <https://epaca.org/code-of-conduct/nd>

⁴ <https://ec.europa.eu/transparencyregister/public/homePage.do>