

Ministry of Defence

6 July 2026

Unpaid appointment with Invictus UK 2027 Ltd: Application under the Business Appointment Rules from David Williams, former Permanent Secretary at the Ministry of Defence.

The Civil Service Commission (the Commission) has considered an application for advice under the Business Appointment Rules (the Rules) from **David Williams**, formerly Permanent Secretary at the Ministry of Defence (MoD). The application is for an unpaid role as a **Trustee at Invictus UK 2027 Ltd (Invictus)**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Mr Williams is a former civil servant at SCS Pay Band 4. His last day of service was 30 November 2025.

The purpose of the Rules is to protect the integrity of the government. They aim to avoid any reasonable concerns that: a civil servant may be influenced in their official duties by the risk of reward; a civil servant may improperly exploit access to information; and an organisation may gain an improper influence through the employment of a civil servant.

The Commission's advice¹ is that the appointment with Invictus should be made subject to the following conditions:

1. Privileged information – Mr Williams 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 the civil service.
2. Lobbying – For two years from his last day in the civil service, until 30 November 2027, Mr Williams should not become personally involved in lobbying the UK Government or its arm's length bodies on behalf of Invictus (including parent companies, subsidiaries, partners and clients). He should also not use, directly or indirectly, his contacts in the government and/or civil service to influence policy, secure business/funding or otherwise unfairly advantage Invictus (including parent companies, subsidiaries, partners and clients).
3. Bids and contracts – For two years from his last day in the civil service, until

¹ See [Advice under the Business Appointment Rules](#) for details applying to all advice issued by the Civil Service Commission.

30 November 2027, Mr Williams should not provide advice to Invictus on a bid or contract relating to the UK Government or its arm's length bodies.

Mr Williams and Invictus confirmed to the Commission his intention to fully comply with the lobbying ban that applied to him, as well as their understanding of, and adherence to the remaining conditions that apply to Mr Williams' role.

The Rules set out that civil servants must abide by the Commission's advice. It is Mr Williams' personal responsibility to manage the propriety of any appointment and to understand any other rules and regulations he may be subject to in parallel with the Commission's advice.

Mr Williams must seek advice if he proposes to extend or otherwise change his role with the organisation. Once this appointment has been publicly announced or taken up, the letter will be published on the Civil Service Commission's website.

Yours sincerely,

A handwritten signature in black ink that reads "S. K. Owen." The signature is written in a cursive, slightly informal style.

Kate Owen
Chief Executive

Annex A: The application

1. According to its website, Invictus UK 2027 Ltd (Invictus) is a single-purpose charity established to organise the Birmingham 2027 Invictus Games. It is distinct from the overall Invictus Games foundation which oversees all such games on an ongoing basis. Initial financial underwriting for the Invictus Games falls under the Office of Veterans' Affairs (OVA) under the remit of the Ministry of Defence.

Applicant assessment

2. Mr Williams will join the Board of Invictus as a Trustee. In this role, he will deliver the organisation's charitable objectives and oversee the successful execution of the Birmingham Games and their legacy. He said he will also work alongside the executive team to ensure the effective stewardship of Invictus' activities.
3. Mr Williams said that the role may involve contact with the government. He said that any primary access to government on behalf of Invictus is expected to occur through the Chair of Trustees, the executive team, and the ex-officio Trustee role held by the Director of the Office of Veterans' Affairs. Mr Williams noted that there are established routes of engagement between Invictus and the Ministry of Defence (MoD). For example, the CEO of Invictus has routine catchups with relevant Ministers, though Mr Williams said that he is not expected to attend these meetings unless he is explicitly invited by government to attend. Additionally, Mr Williams stated he may be consulted on ministerial and departmental engagement, including funding arrangements underwritten by the MoD.
4. As Permanent Secretary at the MoD, Mr Williams was responsible for the department's day-to-day administration, managing its budget, and leading strategic defence reviews and civil service reforms.
5. Mr Williams reported that Invictus' chief executive briefed him on the progress of establishing Invictus UK 2027, specifically regarding strategy, staffing, fundraising approaches, and potential departmental support. He also agreed to the terms of the CEO's secondment from the MoD to the charity.
6. Regarding government support for the Birmingham 2027 Invictus Games, Mr Williams noted that he held responsibility for its financial underwriting during his tenure as Permanent Secretary.
7. In his role as Permanent Secretary, Mr Williams also stated he provided counsel to the then Minister for Veterans on managing potential conflicts of

interest arising from the Minister's sponsorship of Invictus and his role as a local Member of Parliament. Throughout this period, Mr Williams maintained general high-level oversight of veterans' policy and the sponsorship of the OVA following its transfer to the MoD.

Correspondence with Invictus

8. Invictus confirmed its understanding of, and adherence to the Commission's advice and the conditions imposed on Mr Williams' appointment. Invictus confirmed his role will not constitute lobbying.

The Commission's analysis

9. *Application level.* As a Level 1 application for an unpaid role, the Commission's analysis applies the principle that this category of appointment is generally recognised as posing a lower risk to government integrity.
10. *Risk of reward.* Mr Williams stated he was consulted on and agreed to the arrangements for the financial underwriting of Invictus. However, the position is unpaid. Therefore, the risk that the offer was made as a reward for decisions made during his time in office is low.
11. *Access to information.* Mr Williams would have had access to a wide range of information from his former role. This risk is mitigated by the fact that over six months have passed since his last day in civil service, reducing the currency of any information he may still hold. The standard condition regarding privileged information covers any remaining risks.
12. *Improper influence.* As a former Permanent Secretary, Mr Williams may retain contacts in government which could be used to provide an unfair advantage to Invictus. He may also have contact with government officials regarding the charity's work. However, the nature of the organisation goes some way to mitigate these risks. Invictus is a registered charity that works in close partnership with the government. It also has no direct competitors in a commercial sense, though like all charitable organisations, it operates competitively when securing funding, sponsorships, and donations. While the two-year lobbying ban does not prevent all contact with government, Mr Williams must not directly, or indirectly, lobby the government for changes to policy, contracts or funding, as to do so would risk granting Invictus an unfair advantage. Furthermore, the Commission considered it significant that both Mr Williams and Invictus have confirmed their intention to fully comply with the lobbying ban that applies to him. The standard conditions, which prevent the improper use of his government contacts to unfairly benefit the organisation, sufficiently mitigate the risks.

13. *Waiting period.* As an SCS4 official, Mr Williams is subject to a three-month waiting period upon leaving the civil service before taking up any appointments. This is not applicable as it has been over six months since he left the civil service.