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Civil Service Commission

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Civil Service Commission

Cabinet Office
Ministry of Defence

23 September 2026

Paid appointment with Flint Global: Application under the Business Appointment Rules from David Williams, former Permanent Under-Secretary of State at the Ministry of Defence.

Thank you for submitting an application for advice under the Business Appointment Rules (the Rules) to the Civil Service Commission (the Commission) on behalf of **Mr David Williams**, formerly Permanent Under-Secretary of State at the Ministry of Defence. The application is for a paid, part-time role as **Senior Adviser** at **Flint Global, Ltd (Flint Global).** 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 advice[1] is that the appointment with Flint Global 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, its arm's length bodies or NATO Command, on behalf of Flint Global (including parent companies, subsidiaries, partners and clients). He should also not use, directly or indirectly, his contacts in the government and/or civil service or NATO Command to influence policy, secure business/funding or otherwise unfairly advantage Flint Global (including

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

parent companies, subsidiaries, partners and clients).

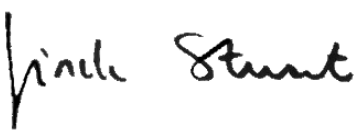
3. Bids and contracts – For two years from his last day in the civil service, until 30 November 2027, Mr Williams should not provide advice to Flint Global on a bid or contract relating to the UK Government or its arm's length bodies.
4. Engagement with government – For two years from his last day in the civil service, until 30 November 2027, Mr Williams should not have engagement on behalf of Flint Global (including parent companies, subsidiaries, partners and clients) with the UK Government or its arm's length bodies.
5. Limitation to the role – For two years from his last day in the civil service, until 30 November 2027, Mr Williams should not provide advice to Flint Global or its clients on any matter that was under consideration by MOD and not yet determined and in the public domain, or matters otherwise not yet in the public domain that he had specific involvement in or responsibility for in developing or determining, during his time as Permanent Secretary.
6. Business development - For two years from his last day in the civil service, until 30 November 2027, Mr Williams should not become personally involved in lobbying contacts in other governments and organisations he has developed during his time in the civil service for the purpose of securing business for Flint Global (including parent companies, subsidiaries, partners and clients).

Flint Global and Mr Williams confirmed their understanding of, and adherence to, the 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,



Gisela Stuart
First Civil Service Commissioner

Annex A: The application

1. According to its website, Flint Global Ltd (Flint Global) provides strategic consultancy and advisory services regarding political, regulatory, and competitive market environments for businesses and investors in the UK, Europe, and Asia-Pacific. The company maintains a Defence Advisory Practice that works with companies and investors in the defence sector to provide strategic advice on the political and policy environment.

2. Flint Global is a registered consultant lobbyist. Flint Global declared lobbying representations on behalf of Hellen Systems in its July to September 2025 transparency return.[2] In March 2026, the Ministry of Defence (MOD) announced that Hellen Systems, as part of a supplier team, was awarded a contract to develop and deploy an eLoran concept for reliable long-range navigation.

3. Flint Global holds contracts with some government departments such as the Competition and Markets Authority, and is on the supplier framework for the Civil Aviation Authority. However, the company has no contractual relationship with the Cabinet Office or the MOD.

Applicant assessment

4. As Senior Adviser, Mr Williams stated he will provide strategic insight on political, policy, and regulatory issues across the UK and Europe for Flint Global's defence and health practices. His role will combine business development advice and client engagement support, his role will centre on broad strategic expertise regarding the UK Government, defence, and health landscapes. Mr Williams confirmed his input will be limited to high-level strategic counsel on government engagement. It will exclude involvement in drafting or contributing to government bids and contracts or utilising sensitive government information. He will also recuse himself from any client relationships or competitive processes linked to his former role.

5. To illustrate the high-level nature of the advice he will provide, Mr Williams explained that his role will be to pose key strategic prompts to clients rather than provide tactical answers or draw on privileged operational insights. For instance, when advising companies considering bidding for projects, his role will involve prompting them to consider their UK build content, export potential, partnership opportunities with allies, intellectual property ownership, operational efficiency, such as reduced crewing or maintenance needs, and flexible financing timelines. He noted a similar approach regarding regulatory

[2] 'Flint Global Ltd', Office of Registrar Consultant Lobbyists
https://orcl.my.site.com/CLR_Public_Profile?id=0014J00000WIB0xQAF

advice, such as under the NSIA[3] framework, where his guidance will take the form of broad strategic questions rather than granular deal assessments. He will prompt clients on core considerations such as parent company ownership structures (and the implications of UK, US, or third-country shareholding), whether the company holds an Intellectual Property that the MOD would seek to protect, single-source versus competitive market dynamics, security of supply guarantees, and UK nationality restrictions for key board appointments.

6. To ensure a clear boundary from his former responsibilities, Mr Williams confirmed his advice will rely exclusively on publicly available information or outside his former remit, such as the Defence Investment Plan (DIP)[4] and the Defence Industrial Strategy 2025[5], ensuring his insights are grounded in public policy rather than sensitive knowledge from his tenure, which ended over nine months ago. He emphasised that the rules, criteria, and underlying legislation governing defence growth areas are entirely in the public domain. He added he will not offer views on any cases he personally handled in post, though all of those matters are now concluded. He highlighted that regulatory oversight for defence supply chain transactions sits with the Department for Business and Trade, while MOD advisory duties fell to the former Second Permanent Secretary and National Armaments Director, not himself.

7. Mr Williams confirmed his proposed role will not involve contact with, or lobbying of, the UK Government. Mr Williams confirmed that the restrictions on lobbying, use of privileged information, and non-engagement on former projects he had involvement in, will provide appropriate mitigations under the Rules for his proposed role with Flint Global.

8. As Permanent Under-Secretary of State (Permanent Secretary) at the MOD, Mr Williams held overall responsibility for the department. He served as the Defence Secretary's principal civilian adviser on defence matters, guiding the ministerial team on departmental strategy and policy, and reporting to Parliament on the department's performance. He also co-chaired the Defence Strategy Group with the Chief of the Defence Staff and was a member of the Defence Council and Defence Executive Committee. As the department's Principal Accounting Officer, Mr Williams was ultimately accountable for all departmental contracts and oversaw the staff involved in contractual dealings.

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[3] The National Security and Investment Act gives the UK Government powers to scrutinise and intervene in business transactions, such as takeovers, to protect national security, while providing businesses and investors with the certainty and transparency they need to do business in the UK.
[4] Ministry of Defence, 'The Defence Investment Plan' https://assets.publishing.service.gov.uk/media/6a44e989167a99cf0018da38/The_Defence_Investment_Plan.pdf
[5] Ministry of Defence, 'The Defence Industrial Strategy 2025: Making Defence an Engine for Growth' https://www.gov.uk/government/publications/defence-industrial-strategy-2025-making-defence-an-engine-for-growth

The Investment Approvals Committee (IAC)[6] is chaired by the Department's Permanent Secretary but this role is normally delegated to Director General Finance, who is a member in their own right. The MOD Annual Report and Accounts 2024/25[7] confirmed that during Mr Williams tenure, the Committee was chaired by the Director General Finance. However, as Permanent Secretary, Mr Williams maintained full visibility of its papers and conclusions, retaining the authority to step in or engage as necessary.

9. Mr Williams stated that he did not meet with Flint Global, nor was he involved in any policy, regulatory, or commercial decisions specific to the company or its competitors, during his time in post. Furthermore, he noted that Flint Global does not compete with the consultancies he engaged with as the MOD Permanent Secretary.

10. Mr Williams stated he was approached for the role by the co-founder of Flint Global after leaving the civil service.

11. Regarding the perception of his appointment, Mr Williams referenced Flint's diverse team of former politicians, civil servants, and city leaders. He considers the proposed appointment to appear low-risk, both in terms of perception and more generally.

Correspondence with Flint Global

12. Flint Global confirmed its understanding of, and adherence to, the Commission's advice and the conditions imposed on Mr Williams' appointment.

Departmental assessment

13. The MOD and the Cabinet Office assessed the risk of this appointment being a reward for past decisions to be low. The departments confirmed that they do not have a relationship with Flint Global, and Mr Williams had no official dealings with Flint Global or its competitors. Further, he was not involved in decisions specific to the company during his role as Permanent Secretary. The MOD stated that although he had contact with some mainstream consultancies (such as KPMG, EY, and McKinsey) in post, these would not be considered competitors to Flint Global. The Cabinet Office added that Flint

[6] The Investment Approvals Committee is a sub-committee of the Executive Committee and the senior body in MOD responsible for decisions on major investment proposals. It sets and enforces the policy and guidance for all investment and disinvestment decisions including where decisions are delegated.

[7] Ministry of Defence, 'Annual Report and Accounts 2024 - 25' https://assets.publishing.service.gov.uk/media/6909c86b14b040dfe829220f/Ministry_of_Defence_annual_report_and_accounts_2024_to_2025.pdf

Global has previously engaged in lobbying on behalf of a client that subsequently received a contract from the MOD. It noted that the contract was subject to established commercial procurement procedures in which Mr Williams was not involved, which limits the risk of criticism regarding the appointment.

14. The departments stated that as Permanent Secretary and the MOD's Accounting Officer, Mr Williams advised ministers on value for money rather than making specific decisions about companies. The boards on which he served generally operate at a strategic level. While he maintained strategic oversight of UK MOD supply chains, his involvement in operational detail was selective and only occurred when necessary. The MOD confirmed he did not routinely engage with the Investment Approvals Committee. Regarding access to commercial information, the MOD confirmed that while he had regular contact with defence industry CEOs, these interactions focused on strategy and delivery rather than specific commercial arrangements. As such, the MOD identified no particular risks concerning competitors or access to commercial information. The Cabinet Office said it agreed with the MOD that the risks are general rather than specific on the basis of the information provided.

15. The Cabinet Office noted that Flint Global's clients may have significant interests in the work of the UK Government and/or the MOD's policy and contracts. The department recognised a perception risk that Mr Williams could possess privileged insight on defence and security matters stemming from his government role, despite time elapsed since departure. For this reason, and as the company has a dedicated practice to advise clients within the defence sector, the departments considered the risk related to his access to information to be greatest should he advise Flint Global and/or its clients on matters relevant to his recent role in the civil service.

16. In considering its mitigations of the information risk, the MOD said that Mr Williams should not be precluded from working with a company within the MOD supply chain on behalf of Flint Global on agreed deliverables, as long as he does not advise on defence matters where he had privileged insight into the matter whilst he was Permanent Secretary or had relationships/dealings with the relevant client/company during his role in post. The department said that this recommendation sufficiently addresses the risk of unfair advantage to Flint Global arising from his access to information as Permanent Secretary, while still permitting appropriate contact with UK MOD supply chains. The Cabinet Office, however, proposed a broader ban on Mr Williams, preventing him advising on the UK defence sector, in line with precedent for senior MOD officials.

17. The departments raised concerns that Mr Williams' extensive network of contacts in government could be perceived as offering Flint Global unfair access. Although Mr Williams does not envisage contact with the UK Government or MOD, the Cabinet Office cautioned that any interaction could be perceived as an avenue for lobbying. To mitigate the risks associated with lobbying, in addition to the standard conditions, the departments recommended Mr Williams be prevented from engaging with the UK Government on behalf of Flint Global and its clients. The MOD recommended extending the lobbying ban to NATO. The Cabinet Office noted that the ban should be extended specifically to NATO Command, reflecting the UK's central role which operates as an extension of the MOD. This excludes NATO allied militaries, which maintain independent engagement and lobbying frameworks.

18. In further considering the risk relating to his network of contacts, the Cabinet Office and the MOD agreed that it would be improper for Mr Williams to leverage industry contacts, or relationships with foreign militaries and governments developed during his time as Permanent Secretary, to pursue commercial interests for Flint Global and its clients. The Cabinet Office therefore recommended a restriction on Mr Williams' lobbying contacts he developed during his time as Permanent Secretary in foreign governments and organisations for business development purposes on behalf of Flint Global.

The Commission's analysis

19. *Risk of reward.* While Mr Williams held significant influence over MOD decisions in his role as Permanent Secretary, the MOD and Cabinet Office confirmed that he did not meet with Flint Global, nor was he involved in any decisions specific to the company or its competitors. Furthermore, the MOD confirmed Mr Williams did not routinely engage with the Investment Approvals Committee. This functional distance between Mr Williams' official duties and the commercial decision-making within the MOD reduces the likelihood that his appointment is a reward for decisions made in post. As such, the Commission agrees with the departments' assessment that the risk of this role being offered as a reward for actions taken in office is low.

20. *Access to information.* As Permanent Secretary, Mr Williams was privy to a range of information on defence and security matters. Further, there is a significant overlap between Mr Williams' role in the civil service and the proposed appointment. The Commission determined that remaining access to information risk is general rather than specific and are partly mitigated by the following factors:

- Nine months have passed since Mr Williams left the civil service, reducing the currency of some of the information he may retain, especially with the fast-moving global security context.
- The MOD and the Cabinet Office concluded that Mr Williams' former role as Permanent Secretary involved broad, strategic oversight rather than granular involvement in commercial arrangements and identified no particular risks regarding his access to sensitive information specific to Flint Global.
- Domestically and internationally, UK defence policy and commercial procurement structures have been reshaped by the implementation of June 2026 DIP[8], which sets out the government's spending plans for the four years from 2026/27 and means pre-existing acquisition and procurement frameworks have expired.

21. The risk relating to Mr Williams' access to information specific to Flint Global is limited. However, it is reasonable to argue that, as Permanent Secretary of the MOD, he had access to a wide range of the most sensitive and privileged information. The Commission therefore considers that the standard conditions provide a significant mitigation, though it does not reduce the risk entirely.

22. *Limitation to the role and ban on advising on UK defence.* The MOD and the Cabinet Office proposed differing approaches regarding the limitations on Mr Williams' proposed role. The MOD recommended a targeted, risk-based approach, suggesting that Mr Williams should be permitted to advise within the defence sector, provided he does not work on matters where he had direct insight or previous relationships during his time as Permanent Secretary. In contrast, the Cabinet Office argued for a more restrictive stance, noting that given Mr Williams' extensive network, a blanket ban on advising the UK defence sector would be more effective in mitigating the perception risks, consistent with precedents for other former senior MOD officials.

23. The Commission considered the perception risk noted by the Cabinet Office and its blanket ban on Mr Williams advising on the UK defence sector. On one hand, Mr Williams was exposed to a range of sensitive information such as unannounced procurement priorities, contractor performance data, and confidential decision-making processes that remain non-public.

24. However, the Commission's position is based on the detailed evidence provided by Mr Williams as to how he will be able to conduct his role without sharing privileged information gained during his time in office. The Commission also noted the departments' view that Mr Williams' tenure

[8] House of Commons Library, 'Defence Investment Plan: Key decisions' https://commonslibrary.parliament.uk/research-briefings/cbp-10935/#:~:text=The%20funding%20will%20also%20support%20the%20Uncrewed,Digital%20targeting%20web.%20%2D%20Cyber%20and%20space.

involved broad, strategic oversight rather than being privy to granular commercial information. Most significantly, the Commission highlights the recent publication of the DIP, serving as a significant mitigating factor as it places the MOD's forward-looking priorities in the public domain and substantially reduces the currency of the sensitive, strategic information he previously held.

25. On balance, the Commission determined that a targeted ban will mitigate this risk and address the perception of an unfair advantage: Mr Williams should not provide advice to Flint Global or its clients on any matter that was under consideration by MOD and not yet determined and in the public domain, or matters otherwise not yet in the public domain that he had specific involvement in or responsibility for in developing or determining, during his time as Permanent Secretary.

26. The Commission understands that by virtue of Mr Williams' senior role in the civil service, the breadth of his oversight was extensive. As such, this condition is not intended to capture that general oversight or prevent him from working on matters he only had passing knowledge of. It is specifically directed at those areas where he had a material, hands-on role in shaping policy or a direct relationship with a commercial entity. Further, the Rules do not prohibit Mr Williams from utilising his general skills, knowledge, experience, and any publicly available information.

27. *Improper influence and engagement with government.* Given Mr Williams' seniority as former Permanent Secretary of the MOD and the nature of Flint Global's defence advisory practice, there is a risk that his professional network could be perceived as an unfair advantage. It would be improper for him to be involved in Flint Global's relationships with government or to advise on government-related work and contracts. While the standard lobbying ban offers some mitigation, the Commission agrees with the departments that this should extend to preventing him from lobbying contacts in NATO Command that he developed as a result of his time as Permanent Secretary. The Commission agrees with the departments' recommendation that, to credibly mitigate the risk of improper influence, an explicit ban on all engagement with government on behalf of Flint Global is necessary for the period Mr Williams remains subject to the Rules.

28. *Business development restriction*. Mr Williams' proposed role involves providing business development advice to Flint Global and its clients. While he possesses a wide network developed prior to his recent role, he also holds contacts developed solely as a result of his Permanent Secretary role. The Commission considers that there is a risk that he could be perceived to provide an unfair advantage to Flint Global were he to draw on those specific

contacts to secure new business on the company's behalf. The Commission agrees with the restriction to prevent him from lobbying any contacts acquired solely from his time in office for the purpose of securing business for Flint Global.

29. *Waiting period*. As an SCS Pay Band 4 official, Mr Williams is subject to a three-month waiting period upon leaving government service in taking up any appointments. This is not applicable as it has been over nine months since he left the civil service.