

# **The UK's Trade Strategy**

## **The Chartered Institute of Export & International Trade's response**

### **Introduction**

The Chartered Institute of Export & International Trade is delighted to be responding to the invitation to provide inputs on the government's upcoming Trade Strategy.

Respondents were asked to consider the following three broad areas:

- How can we facilitate trade for businesses and provide practical tools to support them to drive growth through trade now and in the future?
- How can we build the right partnerships internationally through trade mechanisms to promote growth?
- How should the UK operate in the international context to support and protect businesses?

The below submission puts forward solutions to these questions, in consultation with our members, partners and internal experts.

By way of background, the Chartered Institute's purpose is to empower organisations and equip individuals with the expertise to trade effectively, sustainably and competitively. Established in 1935, the Chartered Institute is trusted by governments, businesses and trade professionals around the world as the leading expert body in international trade and the foremost association of exporters and importers.

We are committed to professionalising trade through education and training while partnering with national and international partners to facilitate the acknowledged mutual benefits of trusted, frictionless and legitimate trade. The Chartered Institute is registered as a charity in the UK and operates globally.

## **Data**

The data for this submission has been taken from a range of sources:

- The Chartered Institute's own internal experts.
- Feedback from members of the Chartered Institute – including businesses and trade professionals.
- A focused Trade Strategy survey distributed to the Chartered Institute's wider community of followers.

We have included some direct quotes from businesses that have responded to the strategy, but have kept these anonymised.



## **Part 1: How can we facilitate trade for businesses and provide practical tools to support them to drive growth through trade now and in the future?**

Facilitating trade for businesses and providing practical tools to support them to drive growth through trade is critical. The Boston Consulting Group has recently published research<sup>1</sup> which shows that the UK's trade in goods is set to grow by an average of only 0.7% a year in the decade from 2023, which is significantly behind the global average of 2.9%.

It is vital to arrest this projected slump if the UK economy is going to avoid stagnation, and instead thrive. We strongly believe that the UK's small and medium business community is key to this, noting that small businesses make up at least 99% of the overall population in each of the UK's main industry sectors.<sup>2</sup> According to the ONS Annual Business Survey of exporters and importers in 2022, only 11.6% of British businesses are exporting their goods.<sup>3</sup> In a time when many are searching for the keys to unlocking meaningful economic growth in the UK, increasing this percentage through revitalising small business export potential is vital.

With that in mind, we asked participants how the UK can ensure that its trade policies are aligned with the needs of small and medium-sized businesses, as well as large corporations. 37% responded that it is important that trade policies prioritise inclusivity by addressing both small business challenges and the strategic objectives of large corporations.

Building on this, and to expand our own investigation into the trade barriers faced by SMEs, we advise that conducting fresh quantitative and qualitative research would help the government to further understand the barriers for businesses that are not currently exporting. It is important to further consult and explore the needs of the market to tailor the help that could be offered practically to biggest groups of future traders.

### ***Facilitating trade through education***

The UK faces real challenges in relation to having a skilled and educated workforce, able to manage the complex requirements needed to turbo-boost the economy. For example, in 2022, the Department for Education

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<sup>1</sup> [Jobs, National Security, and the Future of Trade | BCG](#)

<sup>2</sup> [Business population estimates for the UK and regions 2024: statistical release - GOV.UK](#)

<sup>3</sup> [UK trade in numbers \(web version\) - GOV.UK](#)

found that nearly a third of all job vacancies were related to skills shortages<sup>4</sup>.

International trade education is particularly important for businesses to be able to reach their growth potential and contribute to the economy. At the Chartered Institute, we are passionate about the transformative power of education and professional skills training, both for individual careers and for improving business performance. We believe that fostering a skilled workforce in the UK is the most sustainable means to enable our economy to thrive.

We asked survey participants what kinds of training and/or resources are most helpful to them in trying to enhance cross-border trade skills. Nearly 30% opted for tailored advisory services to overcome hurdles related to adapting to UK trade policy changes. Closely behind this, at 23%, were expert-led webinars – live sessions with trade policy specialists, providing updates on upcoming changes and practical advice for businesses.

More specifically, we tried to ascertain how the government and private sector can collaborate to create training programmes which equip businesses with the knowledge and skills needed to navigate global trade. Almost 50% opted for online courses and webinars focused on international trade, whilst almost a quarter selected 'joint government-private sector certification programmes.'

### ***Digital Skills***

More broadly, in a world in which jobs are increasingly technology-based and where digital skills are a 'must', the UK will face a serious upcoming issue in that younger workers (particularly the 1997-2012 cohort often referred to as 'Gen Z') are part of a digital skills gap. This is partially due to barriers to their education during the pandemic.

A recent study by Digital Product Manger showed that 35% of their community had discovered that Gen Z lacks advanced tech skills.<sup>5</sup> Additionally, a study by Dell in 2023 surveying around 15,000 Gen Z respondents from 15 countries (including 1,041 respondents from the UK) had over two-fifths of respondents noting that their school had only

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<sup>4</sup> [UK looks to overcome damaging skills 'deficit' – DW – 08/10/2024](#)

<sup>5</sup> [DisaZter? Over a Third of Gen Z Workers Lack Tech and Soft Skills](#)

taught them very basic computing skills. One in ten did not receive any education in technology or digital skills at all.<sup>6</sup>

As we progressively move towards digital trade solutions in the international trade landscape, it is vital that the upcoming generation has the skills and wherewithal to manage these kinds of systems.

This is particularly the case given the speed of development of automation and artificial intelligence (AI). The demand for individuals capable of managing more complex roles – such as navigating regulatory frameworks, incorporating data-driven insights in strategic decision-making and navigating international supply chains – is on the rise, as AI becomes increasingly used for carrying out routine tasks.

Businesses need to make the most of the opportunities created by technologies like AI to maintain competitiveness in the global market, and this will involve upskilling workforces from operational positions to high-value and managerial roles.

### ***Customs Expertise***

Facilitation of trade through education is critical, especially for customs intermediaries who play a key role in ensuring compliance and efficiency at the border for many who use their services. Currently, there is no formal licensing regime for customs brokers and other customs intermediaries, however, the project that will introduce the voluntary standard is currently in progress, and it is an essential step towards professionalising the industry.

With the increasing complexities in the post-EU Exit customs landscape, the UK found itself in the face of a shortage of educated and well-prepared staff that could support customs intermediaries in navigating the submission of compliant customs declarations or providing reliable customs guidance to their customers. A commitment to professionalisation will support the UK in bringing customs expertise to the highest standards, reinforcing its reputation as a well-regulated, business-friendly trading environment.

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<sup>6</sup> [Gen Z: The future has arrived | Dell USA](#)

### ***Facilitating trade through managing the regulatory environment***

Fast-moving and unpredictable regulatory changes are particularly challenging for small businesses in the international trade community. This is particularly the case when deadlines are repeatedly moved and/or there is a lack of clarity as to what implementation will look like. A case in point is the Border Target Operating Model (BTOM), where delays eventually became the norm.

We asked survey participants what strategy could be implemented to foster trust and cooperation among countries with different regulatory and business environments. 53% believed that the answer was streamlining regulatory frameworks for cross-border operations.

Since the UK's departure from the EU, importers and exporters have faced significant challenges because of regulatory divergence between the two parties. A mismatch of requirements from both sides have exposed companies to heightened compliance burdens, but also potential risks – such as costly delays, non-compliance penalties and other supply chain disruptions in the absence of appropriate consultation and strategic planning.

A recently consulted-on example is the still-evolving deforestation regulations in the EU and the UK, where the strict due diligence obligations imposed on supply chain stakeholders can result in shipment rejections, legal repercussions, and high penalties if they are misunderstood or disregarded.

To ensure smooth and competitive international trade environment for UK-EU trade, the government should actively review and address regulatory mismatches that create unnecessary burdens for importers and exporters. They should review whether these divergences are necessary and ensure that they are well communicated, with easy-to-understand guidance, to the trading community.

More broadly, there are regulatory changes abroad which affect UK businesses, and being prepared for these changes has never been more important. The lack of preparedness for the introduction of the EU's General Product Safety Regulation (GPSR) has been particularly noticeable.

## **GPSR**

Not only have small businesses struggled to understand how to comply with the new regulations, but even e-commerce marketplaces have so far struggled in implementing appropriate support for their sellers.

This created a risk of users failing to comply with GPSR because they were without either the means to remove NI addresses or they were unable to appoint a representative and gain new certification/documents for products ahead of time.

As a result, it has been widely reported in the media that some businesses have either stopped trading with EU countries and Northern Ireland altogether or are considering doing so.

This highlights a particular example of a lack of industry preparedness for external regulatory changes costing the international trade community vital growth opportunities.

Closely linked to GPSR is the issue of appointing a 'responsible person' when UK small businesses trade with EU countries and NI.

### ***Responsible person***

GPSR measures entail new product safety requirements for Great British (GB) businesses selling to either the EU or to NI in relation to processes including documentation, labelling and risk assessments. This includes the need for an authorised responsible person or representative to act as an agent in the relevant countries, covering a wide range of duties such as cooperating with the authorities of each country. This includes maintaining the product's technical documentation and ensuring safety information is written in a language easily understood by consumers.

Long-standing feedback we have received from businesses, including in the Chartered Institute's role as chair of the E-Commerce Trade Commission, indicates that the process of appointing these representatives, when trading into EU countries, can be challenging for many small businesses. This is both the case in terms of paying for the services of such a representative, but also in relation to identifying ones which are trustworthy, often at short notice. Small businesses now must additionally follow this process to export to NI and the requirement is proving to be a barrier to trade.

The Chartered Institute would be keen to work with the government to form a solution for this barrier, whereby we can support in jointly identifying a bank of trusted representatives in EU countries and NI, make this list publicly available to businesses. The Chartered Institute would be able to accredit these representatives to support business confidence. This would eliminate the amount of time which small businesses are spending in trying to find appropriate representatives.

### ***Facilitating trade through digitalisation***

Digitalisation is a very broad term. In relation to trade, it encompasses the enhanced facilitation of various processes through technology.

There are several priority areas to be addressed in the industry, including: AI, the adoption of measures included in the Electronic Trade Documents Act (ETDA) and the upscaling of IT systems, both governmental and private, which can support in cross-border trade facilitation.

Responses in our survey, in relation, to helpful digitalisation tools and platforms have been collated and quoted below.

### ***Artificial Intelligence (AI)***

There is no mistaking that ensuring the efficient and compliant use of AI as a force for growth is the priority of both governments and businesses alike. This is evidenced by the prime minister's recent approval of a 50-point AI action plan, with Sir Keir Starmer noting in the foreword that AI will be at the forefront of his government's top mission to deliver economic growth.

It is therefore also crucial to consider how AI can be applied to support the full breadth of the international trade landscape.

The E-Commerce Trade Commission, which the Chartered Institute chairs, commissioned a paper from the Social Market Foundation last year looking at how to boost UK small business e-commerce exports.<sup>7</sup> As part of this paper, AI and emerging technologies were considered as a key area of opportunity.

Over a third (37%) of the 500 goods-exporting small businesses (58% exporters and 42% 'considerers') surveyed for this research said that they

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<sup>7</sup> [Small-business-big-world-Sept-2024.pdf](#)



believed that AI would add a 'significant positive difference' to exporting over the next five years. Over a quarter (26%) already use AI in some fashion for exporting purposes.

When asking participants how the customs policy landscape and legal landscape can best be simplified to support cross-border trade, one particular response focused on AI:

"I think automation is the key, with AI so many of these processes can be algorithmed to create a predictive and anticipatory intelligence. I also believe that there is a gap for support organisations, adopt, embrace and embed technology."

However, opinions were more mixed when it came to looking at which technological innovations, including AI, businesses could utilise in the future in relation to optimising supply chain management and increasing international operational efficiency. While almost 50% did select 'AI-powered inventory management systems' as their preferred solution, some respondents shared comments such as:

"No AI please – it's a disaster in the wrong hands."

"Don't believe [the] accuracy is good enough yet from AI."

Elsewhere, 36% of respondents selected that they would implement AI tools for real-time market analysis when considering resources most useful in identifying new trade opportunities and leveraging market intelligence.

### ***Electronic Trade Documents Act (ETDA)***

Beyond digital trade corridor facilitation, wider infrastructure must be in place for the business community to effectively take advantage of digital trade advances. The international trade community witnessed a significant step forward in this respect on 20 September 2023, when the UK's ETDA came into effect.

The act placed electronic trading documents on the same legal footing as paper documents and put in place a framework to enable businesses to move their operations from paper-based to digital-based transactions. The benefits of this piece of legislation lie in both a positive impact on costs, as well as the duration and environmental impact of customs and border

processes, ultimately leading to an overall improvement in the efficiency of trade and lower administration costs.

More broadly, usage of electronic bills of lading (eBLs) in containerised trade has more than doubled since the start of 2023, with nearly 5% of bills of lading going digital, up from 3-4% last year. This is a positive trend, particularly given that moving from paper bills of lading to electronic equivalents is estimated to cut direct trade costs by an estimated US \$6.5bn, while also reducing the industry's carbon footprint.

For businesses to take advantage of the benefits provided by this legislation, the Chartered Institute has been supporting members in understanding the importance of this act and how it can help them trade more effectively with the rest of the world.

The UK has positioned itself as a key leader in digital trade and trade facilitation by spearheading this legislation. However, adoption is proving a challenge from a time and cost perspective. There is a need for a culture of change to be promoted, to support businesses in seeing the long-term benefits that come from the digitalisation of key trade processes.

It is important, therefore, that the international trade community works with government to re-emphasise the benefits of this legislation - particularly in relation to security and long-term time efficiency.

### ***Digital trade corridors***

Digital trade corridors run on systems whereby information is collated from suppliers, transport companies and on digital trade platforms. Government agencies and port authorities have comprehensive access to trusted supply chain information, enabling them to perform checks automatically.

The Chartered Institute has been leading a consortium to trial the benefits of innovative technology platforms, using real-world movements of poultry products from Poland to the UK.

We have previously supported on a former iteration of this model, known as the Ecosystem of Trust pilots. Our participation with consortia on these pilots saw shipments of cut flowers, coffee and tea exported from Kenya to the UK, and fish fingers from Germany to the UK. These pilots reduced the number of checks needed on goods as they moved through the supply

chain. The technology used provided security and visibility of all trade documentations of actors along supply chains, meaning finance, insurance and logistics costs all reduce because they were de-risked.

An evaluation by the Cabinet Office of the effectiveness of these pilots found that using readily available supply chain data can reduce the administration burden of the customs declaration process by 40%, potentially saving traders an average annual cost of up to £225m when fully scaled up<sup>8</sup>.

These kinds of systems are the future of efficient and compliant modern international trade, which is why the Chartered Institute, and related partners, strive to continue pilot-testing new system iterations.

### *Tools and platforms*

When we asked participants a question about *'the most effective digital tools and platforms that can help businesses streamline international trade processes'*, they responded:

"In my experience of helping clients; it's not so much the tool that help but it's my wrap around services that help the business adopt the tool. So many of my clients are sold "state-of-the-art" software that is only kept in the shelf or underutilised."

"Streamlined government digital systems for approval of transactions and goods and issuance of approvals and trade-related documentations."

"Direct user interface"/" Single Trade Window"/" digital declarations".

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<sup>8</sup> [The Ecosystem of Trust Evaluation Report 2023 - GOV.UK](#)

## **Part 2: How can we build the right partnerships internationally through trade mechanisms to promote growth?**

### ***Relationships with established partners***

It is not enough for us to seek out relationships with new trading partners – it is vital that we maintain strong links with established partners, too.

In a world of great political upheaval, it is becoming less certain that administrations in partner countries are on a stable footing. It is therefore important to deepen ties with targeted people of influence within each partner country to be able to continue relevant trade diplomacy negotiations, regardless of the political incumbents.

Through current trade agreements and frameworks, the UK has an advantage in already being part of several strategic relationships, not least the Comprehensive and Progressive Agreement for Trans-Pacific Partnerships, which the UK formally acceded to in December 2024. It is now important that its role is prominent within those frameworks as a stabilising factor. For example, with the prime minister of Canada, Justin Trudeau, recently announcing his resignation, there is likely to be a somewhat changed dynamic within CPTPP.

When we asked participants how the UK could establish more effective trade partnerships which foster long-term economic growth and mutual benefit, the answer was clear. A vast majority (82%) answered that simplifying trade regulations and agreements was the key.

### ***Relationships with new partners***

#### ***Building blocks***

When asking participants how the customs policy landscape and legal landscape can be simplified to support cross-border trade, 30% of respondents selected the option: 'Free trade agreements negotiated and implemented with a focus on digital trade enabling agreements'. As we have learnt from our survey, it is vital that these agreements are negotiated with very clear terms of reference, which also take into account ESG considerations.

Beyond trade agreements, there are practical steps that can be taken to support direct business-to-business engagement between countries. For example, trade missions and international trade fairs in specific countries

are useful methods of exposure and engagement. However, sometimes businesses need a helping hand to be aware of these opportunities and then to have the wherewithal to take advantage of them.

When we asked participants how trade missions and international trade fairs can be optimised to encourage the formation of new partnerships, 33% noted that focusing on specific sectors and industries was the way forward, whilst 29% wanted increased subsidies for small businesses to participate.

Building relationships with new partners is also aided by effective digital tools. For example, 35% of participants were in favour of creating a global trade networking app or platform, and 27% wanted a robust blockchain-based system in place for effective business data sharing.

With both suggestions, building a foundation of trust is a key part of making such ideas effective. We often hear from businesses that they go to one another for advice on many decisions and thereby 'standing on the shoulders' of those who have gone before. This is also why the Department for Business and Trade's Export Champions programme is so effective. Similarly, a global trade networking app or platform - built with similar positive intentions in mind in terms of information-sharing, providing inspiration and promoting opportunities - could produce meaningful direct opportunities for businesses across the globe, as well as quickly identifying barriers as they arise, which can then be fed back swiftly to respective governments.

### ***Emerging markets***

Emerging markets are another key opportunity area for UK businesses to take advantage of, particularly as they reflect an increasing demand for imported products, which provides considerable opportunity for UK small business exporters.

In the E-Commerce Trade Commission's paper last year<sup>9</sup>, emerging markets were examined in relation to the opportunity they hold for small business e-commerce exporters. In addition to the survey data of 500 small businesses for this paper, the Department for Business and Trade also led a working group on emerging markets specifically.

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<sup>9</sup> [Small-business-big-world-Sept-2024.pdf](#)

For emerging market ‘considerers’ which were already exporting to developed economies, interest in such places was driven by the prospect of untapped customers for the kinds of products they sell (25%) and evidence of existing demand for the products they offer, which they believe they can win a share of (25%).

Barriers include external obstacles such as customs, demand conditions, regulatory complexity and risks associated with the transportation of products to customers in emerging markets. Additionally, payment reliability and the existence and strength of relationships with in-country partners were particular challenges.

Both the survey and working group suggested new measures to be included in the Industrial and Trade Strategies to support businesses to seize these opportunities, including a pledge to work with industry to identify a number of ‘high e-commerce potential’ developing economies, as well as a promotion campaign aimed at encouraging SMEs to consider exporting to these ‘high priority’ markets, especially through e-commerce channels.

Additionally, it was suggested that the UK should plan to actively pursue bespoke agreements with ‘high e-commerce potential’ countries and to consider the support available through trade tech. Trade tech has a role to play in terms of reducing some ‘at the border’ costs, which can be comparatively high compared to many developed economies. Put simply, for many this would involve the digitisation of export paperwork. A study of likely impacts on the costs of intra-Asia trade from document digitisation alone suggested it could cut the ‘time to export’ by 24% and the direct costs of exporting by 17%.<sup>10</sup> This is not an insignificant time and cost saving and highlights the potential there is for UK exporters to pursue opportunities with emerging markets, as they increasingly develop systems which are faster and interoperable.

### ***Re-establishing relationships***

2025 has been called the year in which the UK could begin to ‘reset’ its relationship with the EU. Resetting often implies that a situation will return exactly to the way it was. While few are so naïve as to believe that this will happen, the international trade community is still watching with bated

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<sup>10</sup> [Reducing trade costs : estimating the benefits of cross-border paperless trade | ESCAP](#)

breath in the hopes that there is a middle path available for the lowering of trade barriers.

The review of the UK-EU Trade and Cooperation (TCA) Agreement is due to begin in May 2026, and there are options available for progress to be made beforehand, particularly as there is some doubt as to the differing intentions from both sides on their approaches to the review. This progress could be made in the form of reviewing current UK and EU priorities in recent Domestic Advisory Group (DAG) reports and also considering specific agreements on particular issues such as SPS or mobility agreements.

In addition, there are some areas where there could well be some good ground to be gained in discussions with the EU, such as customs collaboration through exploring live (or close to live) data sharing and single declarations, as well as deployment of digital solutions. As customs collaborations are considered, thought should also be given to the EU Customs Union reforms and the UK Border Target Operating Model (BTOM) to ensure that measures are as complementary as possible.

Furthermore, there is the opportunity for better utilisation of Trusted Trader (AEO) programmes and early engagement on the EU's Trust & Check trader programme (which is also part of the EU Customs reforms).

When the Chartered Institute surveyed participants on an EU-UK trade webinar in May 2024 regarding priorities for the government in terms of the future UK-EU relationship, 54% said that it should be 'trade facilitation within the TCA'.

More broadly, with various EU regulations increasingly affecting UK trading businesses, there is a need for an effective balance to ensure that UK exporters continue to reap the benefits of trading with both NI and EU countries. Barriers such as the ones listed above in relation to GPSR, responsible person requirements, and wider challenges such as VAT registration and returns, all need close attention. Positively, events like the UK-EU summit provide a key opportunity to bridge any relational gaps preventing the progression of future negotiations.

Simplification of trade with the EU came up consistently in our responses from survey participants. When asked about how best to simplify customs

policies and the legal landscape to encourage cross-border trade, some responded with EU-specific applications:

“Standardisation, as much as possible, across borders in the EU.”

“A single free movement/market agreement with the 27 members of the EU.”

Similarly, when we asked which key international trade agreements, frameworks or markets the UK should prioritise with its partnerships, just over 50% selected the EU single market, far outstripping other options such as the CPTPP, Gulf Cooperation Council (GCC) and India.



### **Part 3: How should the UK operate in the international context to support and protect businesses?**

#### ***Trusted trade philosophy***

As international supply chains and the global economy continue to grapple with political uncertainty and economic instability, it is evident that traditional systems and processes are no longer adequate.

The free-trade agenda has, in some cases, been weaponised. If we are to successfully navigate the geo-political upheavals, societal challenges and the ever-growing impact of unpredictable 'black swan' events, a new framework of 'trusted trade' must be established. This framework should be based on the principles of transparency, inclusivity and integrity.

With the World Trade Organization (WTO) stuck in deadlock on key issues, including key digital trade agreements, the UK should be looking to take a lead in shaping a new era for global trade. A move away from the traditional 'free trade' model to one of 'trusted trade' is needed, making the most of the benefits of trade digitalisation, supply chain visibility and collaborative partnerships built on agreed global standards.

Trusted trade is built on resilient and transparent supply chains. We asked our survey participants how the UK can foster greater resilience in its supply chains, in the face of global disruptions. Around 30% chose 'establishing long-term strategic agreements with trusted international partners.' This is particularly important given the challenges that can arise in terms of differing regulatory and ESG considerations in supply chains in partner organisations.

These trusted supply chains also rely on effective trade diplomacy to ensure that the UK's businesses have both fair access to international markets and are protected from unfair trade practices. Nearly 30% of participants noted that engaging with international regulators was a key way forward to ensure this.

We also asked participants what measures the UK should take to protect British businesses from unfair competition, particularly from countries with less transparent regulatory systems.

Just under half (48%) responded that trade deals should be negotiated which prioritise transparency and fair competition. A quarter (25%) believed

that the solution was broader: promoting ethical and sustainable business practices globally.

Clearly, it is the case that wherever the UK does business, it must uphold the high environmental, social and governance standards that the British business community are proud to be flag-bearers of.

### **Conclusion**

There are many factors to consider throughout this submission, but the golden thread running throughout is the clear need to reduce the friction currently facing many UK businesses as they seek to trade internationally. Reducing trade frictions for businesses, particularly through education and guidance, is what the Chartered Institute has been supporting businesses to do for the past 90 years. Taking steps to actively reduce trade frictions is what we also hope that the current government will be able to do as they thoughtfully consider the priorities of a long-term Trade Strategy, and the support the business community will need in order to take advantage of, and execute, those priorities. We hope that this submission goes some way towards provoking thought to that end.

### **Additional information**

If you have any questions regarding this submission, please email [ilona.kawka@export.org.uk](mailto:ilona.kawka@export.org.uk) and [grace.thompson@export.org.uk](mailto:grace.thompson@export.org.uk).

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