



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS
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BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: General Sir Christopher Tickell, former Deputy Chief of the General Staff, Ministry of Defence. A paid appointment with Wifinity Limited (Wifinity).

1. Sir Christopher 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 an appointment Sir Christopher wishes to take up with Wifinity Limited (Wifinity). The material information taken into consideration by the Committee is set out in the annex.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during time in office, alongside the information and influence a former Crown servant may offer Wifinity.
3. The Committee has advised that a number of conditions be imposed to mitigate the potential risks to the government associated with this appointment under the Rules; this does not imply the Committee has taken a view on the appropriateness of this appointment for a former Deputy Chief of the General Staff, Ministry of Defence (MOD) in any other respect.
4. The Rules¹ set out that Crown servants must abide by the Committee's advice. 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

5. When considering Sir Christopher's application to join Wifinity as a Non Executive Director, the Committee² took into account that whilst there is a commercial

¹ Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The Queen's Regulations and the Diplomatic Service Code

² This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Sarah de Gay; Isabel Kiddy; The Rt Hon Lord Pickles; Mike Weir; Lord Larry Whitty. Dr Susan Liautaud and Richard

contract between Wifinity and the MOD, Sir Christopher had no involvement in this commercial decision. The department also confirmed that he did not have any official dealings with Wifinity or their competitors whilst in post, therefore the Committee considered the risk he could be seen to have been offered this role as a reward for decisions made, or actions taken in office, as low.

6. There are inherent risks attached to this application. Sir Christopher had access to privileged information whilst in post. The Committee takes into consideration that the department noted he did not have access to specific sensitive information that would be of benefit to Wifinity, though the Committee would draw Sir Christopher's attention to the privileged information ban, which prevents his use of information to the unfair advantage of Wifinity.

7. The MOD noted that Sir Christopher gained a wide range of contacts from his time in Crown service that could provide an unfair advantage if he were to make contact with them for the purpose of securing business. The Committee has imposed a condition which prevents Sir Christopher from making contact with other governments or contacts from other organisations, gained from his time in Crown service, for the purpose of business development. The Committee notes this is in keeping with the responsibilities of his role.

8. Due to Sir Christopher's influence within defence, it would also be improper for him to lobby the government or advise on a bid or contract with the government, reflected in the conditions below.

The Committee's advice

9. The Committee determined the risks above can be appropriately mitigated by the conditions that apply, below.

10. The Committee's advice in accordance with the government's Business Appointment Rules is that this role with the **Wifinity Limited** be subject to the below conditions:

- he 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 Crown service;
- for two years from his last day in Crown service, he should not become personally involved in lobbying the UK government or any of its Arm's Length Bodies on behalf of Wifinity Limited (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage Wifinity Limited (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service he should not provide advice to Wifinity Limited on the terms of, or with regard to the subject matter of, a

Thomas was unavailable.

bid or contract with, or relating directly to the work of the UK government or any of its Arm's Length Bodies; and

- for two years from his last day in Crown service, he should not become personally involved in lobbying contacts he has developed during his time in Crown service and in other governments and organisations for the purpose of securing business for any company or organisation (including parent companies, subsidiaries and partners).

11. The advice and the conditions under the government's Business Appointment Rules relate to your 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. Sir Christopher must inform us as soon as he takes up this work or if it is announced that he will do so. We shall otherwise not be able to deal with any enquiries since we do not release information about appointments that have not been taken up or announced. This could lead to a false assumption being made about whether Sir Christopher has complied with the Civil Service code. Similarly, he must inform us if he proposes to extend or otherwise change his role with the organisation as depending on the circumstances, it might be necessary for him 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.

Andrea Benjamin
Committee Secretariat

Annex - Material information

The role

1. Wifinity is a broadband provider. Its website says it is the *'fastest growing wireless internet service provider in Europe, who have connected more than 7 million customers across the UK, Northern Ireland and Germany'* since starting in 2007. Its portfolio includes recreational and corporate connectivity solutions serving Student Defence, Residential, Holiday Park and Enterprise sectors.
2. Sir Christopher stated this is a part time, paid position as Non Executive Director. He stated: *'As a NED I will provide a creative contribution to the board by providing independent oversight and constructive challenge to the executive directors without any day to day executive responsibilities. I will also act as a support and mentor to the CEO. The role will not involve any contact with HMG or the UK MOD.'*

Dealings in office

4. Sir Christopher stated he neither met with, nor made any decisions regarding Wifinity or their competitors. He also stated he had no access to sensitive or commercial information on Wifinity or their competitors.

Department Assessment

6. The MOD were consulted regarding this application. The department stated that Wifinity provides two types of services for MOD personnel and offices, however confirmed Sir Christopher had no involvement in any decisions regarding this. The MOD also confirmed the details Sir Christopher gave in his application, and noted that if he were to make contact with organisations from his time in Crown service for the purpose of securing business, this would be improper and suggested a condition be put in place to mitigate this. The MOD had no concerns regarding this application, should the appropriate condition on preventing his contacting organisations from his time in Crown service be applied.