



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: General Sir Christopher Tickell, former Deputy Chief of the General Staff at the Ministry of Defence. Paid appointment with PA Consulting Services Limited.

1. Gen Sir Chris 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 he wishes to take up with PA Consulting Services Limited (PA) as a Strategic Adviser. 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 Gen Sir Chris' time in office, alongside the information and influence a former Crown servant may offer PA Consulting Services Limited.
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 Crown servant 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 of the risk presented

5. The Committee² took into account that contracts were awarded to PA while Gen Sir Chris was Deputy Chief of the General Staff. The MOD confirmed the competitive process for all contracts with the organisation and its competitors were run by the Commercial Branch, Army HQ. Gen Sir Chris had no involvement in this branch and

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.

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

both the MOD and Gen Sir Chris confirmed he had no involvement in the contractual or commercial decisions affecting PA or other consultancy companies. As Chair of the Army Executive Committee he did have oversight of delivery and PA were sometimes at meetings to discuss. His role as Chair of the Army Executive Committee was limited to being kept abreast of PA's progress on work - commercial aspects of the contracts were not discussed. There is no evidence Gen Sir Chris made any decisions or took action in expectation of a future role with PA.

6. As the former Deputy Chief of the General Staff Gen Sir Chris may have had access to privileged knowledge about opportunities for consultancy support at the MOD. The Committee considered risks under the Rules may arise should he advise PA or its clients on matters related to its work with the UK government, as he may offer unfair insight into the UK government's future needs as a result of his time in government. However, Gen Sir Chris' proposed role will have no involvement with the UK government or the MOD and his work will be focused in the US, Australia and NATO countries. Further Gen Sir Chris is prevented from drawing on privileged information from his time in office and has an ongoing duty of confidentiality.
7. PA's clients are unknown and there is a risk Gen Sir Chris may be asked to advise clients who were affected by matters that relate to areas he had direct involvement in, or in respect of clients he had a relationship with whilst in Crown service.
8. The Committee also considered as Deputy Chief of the General Staff, Gen Sir Chris will have gained contacts in the UK and internationally - within other governments and private companies, particularly in the defence sector. As such there is a risk his network and influence might be used to the unfair advantage of PA.

The Committee's advice

9. There are risks associated with Gen Sir Chris' broad responsibilities in office, and the unknown clients of PA. The Committee considered it would be appropriate to advise that he is prevented from advising the company or its clients on the UK defence sector; as well as in being prevented from working on any policy he had specific involvement in or responsibility for as Deputy Chief of the General Staff.
10. The Committee would draw Gen Sir Chris' attention to the restrictions below which will prevent him from providing an unfair advantage to PA in respect of privileged information or contacts gained from his time in office
11. The Committee advises under the government's Business Appointment Rules that Gen Sir Chris' appointment with **PA Consulting Limited** be subject to the following 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 PA Consulting Ltd (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage PA Consulting Ltd (including parent companies, subsidiaries, partners and clients);

- for two years from his last day in Crown service, he should not provide advice to PA Consulting Ltd (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of the UK government, the Ministry of Defence or its trading funds;
 - 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 office in external organisations (including other governments) for the purpose of securing business for PA Consulting Ltd (including parent companies, subsidiaries and partners);
 - for two years from his last day in Crown service, he should not advise PA Consulting Ltd (including parent companies, subsidiaries, partners and clients) on work with regard to any policy or operational matter he had specific involvement or responsibility for as Deputy Chief of the General Staff at the Ministry of Defence, or where he had a relationship with the company or organisation during his time at the Ministry of Defence; and
 - for two years from his last day in Crown service, he should not advise PA Consulting Ltd or its clients on the UK defence market.
12. The advice and the conditions under the government's Business Appointment Rules relate to Gen Sir Chris' previous roles 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.
13. 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 Civil Service Code or otherwise.
14. 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*'.
15. You must inform us as soon as Gen Sir Chris takes up employment with this organisation, 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 Gen Sir Chris has complied with the Rules.
16. Please also inform us if he proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him to make a fresh application.
17. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant

annual report.

Yours sincerely,

Isabella Wynn
Committee Secretariat

Annex - Material information

The role

1. Gen Sir Chris wishes to take up a paid appointment as a strategic advisor with PA. He said PA is a management consultancy activities other than financial management. The website states PA is a professional services firm that works with public, private and third-sector organisations. It was founded in 1943 and is now one of the world's largest management consultancy firms.
2. Gen Sir Chris said as a strategic advisor he will support and advise PA as they write and implement a strategy for increasing their business in the US, Australia and NATO countries and also to provide advice to PA's SME clients as they look to write their own strategies and scale up. He said he will not be working with the UK MOD or any other government departments.
3. He said he would have no contact with government in this role.

Dealings in office

4. Gen Sir Chris said contracts were 'run' by the relevant Senior Responsible Officer (SRO) and performance management was conducted by the SRO and commercial team; he said he was never involved in such activity.
5. Since 2018 (before he was appointed), PA Consulting have won contracts valued in total at £26M, including a P3M Support contract - (let before he was appointed worth £12.1 M) Gen Sir Chris said during his tenure as DCGS, the Army had contracts with multiple consultancies (McKinsey, KPMG, Newtons, Deloitte, PA etc). However he had no involvement in this.
6. Gen Sir Chris said during his tenure as DCGS, the Army had contracts with multiple consultancies including PA. However, he said he had no involvement in contracts with PA. He explained the need for any work was identified and run by the relevant One or Two Star officer /civil servant who then became the SRO once the contract was let. All contracts with PA were awarded via competition by the Commercial Branch, Army HQ without any involvement from Gen Sir Chris. He said he specifically excluded himself from all such deliberations to avoid any accusations of bias. He said he never had any direct contact with PA or any other consulting firm during the process that led to any contract award.

7. The only interaction Gen Sir Chris had with PA was through his role as Chair of the Army Executive Committee³. Gen Sir Chris said this Committee's role is to ensure all aspects of the army's business is succinct and work together to deliver one service. He said the only time he met with a contractor and SRO, including PA, was to report on the progress of the work - no contractual or commercial information was discussed.
8. He said *'The output of the work was the responsibility of the SRO who, if appropriate, briefed the Army Executive Committee (a body of 14 One and Two Stars which was chaired by me as DCGS). Sometimes the contractors accompanied the SRO and sometimes they did not. As DCGS I never had ownership of any contracts with consultants and definitely not with PA. The only work that PA conducted that I had visibility of through ExCo was their support to Army HQ in redefining the Army Operating Model (AOM); this was very similar to the support that they provided to the Royal Navy and Strategic Command and so there were very useful similarities and indeed best practice that we were able to export and adopt. The SRO (the Assistant Chief of the General Staff) briefed the Army ExCo on progress on the AOM approximately quarterly; PA was sometimes present at those meetings but not always.'*

Department Assessment

9. The MOD confirmed the details Gen Sir Chris provided.
10. The MOD confirmed he was not involved in any commercial discussions or decisions with PA and was only exposed to their work through ExCo when the relevant SRO led the discussions. It further stated *'PA has had contracts with MOD, and PA also conducted work supporting Army HQ in redefining the Army Operating Model. However, contract award and management was the responsibility of his subordinates, with Sir Chris only becoming involved to provide overall context for the work as it progressed'*. The MOD said he maintained suitable distance between himself and all contractors throughout his time as DCGS and *'...curried no favour from or with them'*.
11. MOD said it had no concerns with this appointment and recommended the lobbying ban as well as a ban preventing any contact with the MOD and no involvement in PA's contracts with PA.

³ ExCo supports the Defence Board and is the main executive board for MOD; it provides top-level leadership and decision-making across Defence. ExCo drives the annual Defence Plan and identifies and responds to risks and issues through regular routine updates on sub-committee activity and by taking papers on other issues put forward by members and secretariat. The Committee considers the major managerial and strategic policy issues impacting Defence at a more delivery-focused level than the Defence Board