



## **OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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### **BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: Air Chief Marshal Sir Michael Wigston CBE, former Chief of the Air Staff. Unpaid appointment with King's College London, University of London.**

1. Air Chief Marshal (ACM) Sir Michael 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 unpaid role he wishes to take up with King's College London as a Visiting Professor in the War Studies Department.
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during ACM Sir Michael's time in office, alongside the information and influence he may offer King's College London. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment - it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. The Rules set out that Crown servants must abide by the Committee's advice<sup>1</sup>. 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 risks

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<sup>1</sup> 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

5. When considering this application, the Committee<sup>2</sup> took into account this appointment as Visiting Professor is unpaid<sup>3</sup>. Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of the Government by considering the real and perceived risks associated with former ministers joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions or take action in office to in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.
6. As the former Chief of the Air Staff, the Committee noted there could be a perceived risk ACM Sir Michael would have had access to a range of particularly sensitive information. However, given the academic and unpaid nature of the role, there is a low risk he could be seen to use this information for personal gain.

### The Committee's advice

7. The Committee did not consider this appointment raises any particular propriety concerns under the government's Business Appointment Rules. There are inherent risks associated with access to sensitive information and contacts. The standard conditions below, which seek to prevent ACM Sir Michael from drawing on his privileged information and using his contacts to the unfair advantage of King's College London, will sufficiently mitigate these risks.
8. Under government's Rules, ACM Sir Michael is also subject to a three-month waiting period due to his seniority in government and the range of information he would be exposed to.
9. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with **King's College London** be subject to the following conditions:
  - a waiting period of three months from his last day in post as Air Chief Marshal;
  - 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 its arm's length bodies

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<sup>2</sup> This application for advice was considered by Baroness Jones of Whitchurch; Andrew Cumpsty; Isabel Doverty; The Rt Hon Lord Eric Pickles; and Mike Weir. Richard Thomas; Jonathan Baume and Sarah de Gay were unavailable.

<sup>3</sup>By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

on behalf of King's College London (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage King's College London (including parent companies, subsidiaries, partners and clients); and

- for two years from his last day in Crown service, he should not provide advice to King's College London (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the UK government and its arm's length bodies.
10. 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/House of Lords Commissioners for Standards. It is an individual's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.
  11. ACM Sir Michael must inform us as soon as he takes up employment with this organisation, or if it is announced that he will do so and we will publish this letter on our website. Any failure to do so may lead to a false assumption being made about whether he had complied with the Rules.
  12. ACM Sir Michael must 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.
  13. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Yours sincerely,

Hamzah Rizvi  
**Committee Secretariat**

## Annex - Material information

### The role

1. ACM Sir Michael said he wishes to take up an unpaid, part-time role with King's College London where he will be a Visiting Professor in the War Studies Department.
2. ACM Sir Michael said his role will involve occasional lecturing and mentoring of students. He said his role will have no contact with government.

### Dealings in office

3. ACM Sir Michael advised the Committee that he did meet with King's College London where he interacted with the Freeman Air and Space Institute, lecturing and on discussion panels as Chief of the Air Staff. He also stated there is a departmental relationship, as members of the Department of War Studies have also supported Royal Air Force conferences. However, he stated he did not make any policy or regulatory decisions specific to King's College London.

### Departmental Assessment

4. The MOD confirmed the details ACM Sir Michael provided and stated that:
  - he did not make any decisions specific to King's College London, his involvement in the relationship with King's College London was limited to non-contractual interchange at the academic / thought leadership level;
  - he had interaction with a number of think tanks and academic institutions as part of his role as Chief of the Air Staff. This has been limited to exchange of expertise on thought leadership in Air and Space, rather than in specific commercial negotiations; and
  - it has a broad relationship with King's College London which includes a contractual element - KCL are under contract to the MOD to support provision of education at the Defence Academy, but this is in a different area (UK Strategic Command) than the part of the MOD that Sir Michael had responsibility for (Air Command) and was not involved in this procurement. King's College London is one of a consortium of partners that supports training at the Joint Services Command and Staff Course and Royal College of Defence Studies of the Defence Academy.
5. The MOD stated that: *'Clearly Sir Mike has the highest level of connections and insights across the RAF and MOD. However the risk that this appointment could be perceived to give his new employer undue advantage*

*can be restricted by standard conditions on lobbying, sharing of sensitive information, and involvement in bids relating to the MOD.'*