



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

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)

Website: <http://www.gov.uk/acoba>

April 2024

**BUSINESS APPOINTMENT APPLICATION: Air Chief Marshal Sir Mike Wigston KCB CBE , former Chief of the Air Staff at the Ministry of Defence. Paid appointment with MyDefence A/S.**

1. Air Chief Marshal (ACM) Sir Mike 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 his proposed role with MyDefence A/S (MyDefence) as Director.
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 ACM Sir Mike made during his time in office, alongside the information and influence he may offer MyDefence. 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<sup>1</sup> 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. There is an overlap here given MyDefence specialises in anti-drone detection and ACM Sir Mike oversaw the Royal Air Force's use of drones and their capabilities as Chief of the Air Staff. There is no known relationship between

---

<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.

MyDefence and the Ministry of Defence (MOD). ACM Sir Mike did not meet with the company, nor did he make any decisions specific to the company during his time in service. As such, the Committee<sup>2</sup> considered there is no reason it might be perceived that this appointment is a reward for decisions made or actions taken in office.

6. ACM Sir Mike will have had access to sensitive information around the UK's defence requirements and capabilities for operations. Specifically, he had overall responsibility for the use of radio technologies to detect and disrupt drones carrying explosives and improvised explosive devices in the Royal Air Force. However, MyDefence does not currently have a relationship with the UK MOD and his role with MyDefence is focussed outside of the UK- in Europe and the US. The MOD confirmed that ACM Sir Mike ceased having access to sensitive information in June 2023. This provides a gap of 10 months between his last access to privileged insight and information and taking up this work. The Committee also considered the international facing aspect of this role, outside of the UK, was a significant mitigating factor.
7. ACM Sir Mike would also have amassed a wide range of contacts during his time in office, in the UK government and beyond. This could be seen to offer MyDefence unfair access to markets as it grows its presence across Europe and in the US. There is also a significant risk, should MyDefence wish to enter the UK market, ACM Sir Mike would offer unfair access to the UK MOD. It would be difficult to mitigate reasonable concerns that any contact he had with the UK MOD would be for this purpose.

#### The Committee's advice

8. The Committee considered that ACM Sir Mike's role in the MOD presents real and perceived risks associated with his access to information, particularly in relation to the UK's capability requirements and its operation of UAV technology. The Committee recognised that ACM Sir Mike plans not to work in the UK sector for MyDefence and the risk is limited whilst it does not have a relationship with the MOD. There remains a significant risk that he could offer the company unfair access and influence should it look to extend its reach into the UK. The Committee agreed with the MOD and has imposed a condition which prevents him from advising on the UK defence sector to mitigate this risk, this includes advising that he must have no direct engagement with the UK government on MyDefence's behalf.

---

<sup>2</sup>This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; Sarah de Gay; The Rt Hon Baroness Jones of Whitchurch; Dawid Konotey-Ahulu; The Rt Hon Lord Eric Pickles; Michael Prescott; and Mike Weir.

9. The remaining conditions below make it clear that he must not make improper use of his access to privileged information, contacts and influence from his time in government service to unfairly advantage MyDefence.
10. The Committee advises, under the government's Business Appointment Rules, that ACM Sir Mike's role with **MyDefence A/S** should 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, MOD, or their arm's length bodies on behalf of MyDefence A/S (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 MyDefence A/S (including parent companies, subsidiaries, partners and clients);
  - 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 and in other governments and organisations for the purpose of securing business for MyDefence A/S (including parent companies, subsidiaries and partners);
  - for two years from his last day in Crown service, he should not provide advice to MyDefence A/S (including parent companies, subsidiaries or partners) 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 MOD and its trading funds, or their arm's length bodies; and
  - for two years from his last day in Crown service, he should not advise MyDefence A/S (including parent companies, subsidiaries or partners) or its clients on the UK defence market; and he must not directly engage with the MOD/UK government or its arm's length bodies on MyDefence A/S' behalf (including parent companies, subsidiaries, partners and clients).
11. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's previous role in government only; they are separate from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for

Standards and the Registrar of Lords' Interests<sup>3</sup>. 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 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. You must inform us as soon as ACM Sir Mike takes up employment with this organisation, or if it is announced that he will do so, by emailing the office at the above address. 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.
15. 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

Jess Barrow  
**Committee Secretariat**

## **Annex- material information**

### The role

1. ACM Sir Mike said that MyDefence A/S is a small Danish company with a US subsidiary - MyDefence LLC, specialising in radio technologies to detect and disrupt drones carrying explosives and Improvised Explosive Devices . It

---

<sup>3</sup> All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers

protects people, vehicles and fixed sites. Customers include European prisons, police forces, and NATO and other European armed forces. MyDefence does not have a relationship with the UK MOD nor government more widely.

2. ACM Sir Mike wishes to take up a paid role as Director for MyDefence. He said his role will be to advise the CEO and leadership team as the company grows in Europe and the US. He will help senior management to craft its business and growth strategy, including in relation to:
  - organisational design
  - product design
  - international footprint
  - talent management
3. ACM Sir Mike said that his role is not UK based, nor will his role involve any direct commercial activity. ACM Sir Mike said that he will have no involvement in business involving the UK MOD, nor the UK government, in lobbying ministers, advising on how to represent the interests of MyDefence. He also made it clear to the Committee he would not use the military network he gained in office.

#### Dealings in office

4. ACM Sir Mike said he was not responsible for any related commercial policy or regulatory areas as Chief of the Air Staff. He said that his role was operational, overseeing the delivery of defence policy and priorities to meet the Chief of Defence Staff's objectives. ACM Sir Mike said that the MOD does not have a relationship with MyDefence and he did not meet with the company whilst in office.

#### Departmental assessment

5. The MOD confirmed that it has no relationship with MyDefence A/S or its US subsidiary: MyDefence LLC. The MOD confirmed that the air force has numerous relationships with companies in the same sector in which MyDefence operates. It said that as the Chief of The Air Staff, ACM Sir Mike will have had overall responsibility for these relationships but commercial dealings were delegated to others.
6. The MOD said that whilst ACM Sir Mike made no decisions specific to the company, and the company operates overseas, he will undoubtedly have had strategic insight into the RAF's use of drones and their capabilities - having overseen the air force's use of unmanned aerial vehicles (UAV) technology. He had overall responsibility for the use of radio technologies to detect and disrupt drones carrying explosives and improvised explosive devices in the Royal Air Force.
7. The MOD recommended that further to the standard conditions, ACM Sir Mike's role with MyDefence should be limited so that he is prevented from advising MyDefence on the UK defence market and using his contacts gained

in office but outside of government to the unfair advantage of MyDefence.