



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

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**BUSINESS APPOINTMENT APPLICATION: Air Chief Marshal Sir Michael Wigston CBE, former Chief of the Air Staff at the Ministry of Defence. Paid appointment with Boston Consulting Group (BCG).**

1. Air Chief Marshal Sir Michael Wigston (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 an appointment he wishes to take up as a Senior Advisor for Boston Consulting Group (BCG).
2. The purpose of the Rules is to protect the integrity of the government. The Committee considered whether this appointment was unsuitable given ACM Sir Mike's former role as Chief of the Air Staff, and the focus of this role in defence and possibly in relation to a range of unknown clients. The Committee has considered the risks associated with the actions and decisions made during ACM Sir Mike's time in office, alongside the information and influence he may offer BCG- the information provided by the applicant and the department. 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 and a waiting period 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.

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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.

### The Committee's consideration of the risk presented

5. As Chief of the Air Staff, ACM Sir Mike was one of the highest ranking officers at the MOD. As a result, he was a member of a number of MOD governance boards including Defence Board, the Defence Delivery Group and the Chiefs of Staff Committee. BCG is a management consulting firm that operates in the defence sector, in addition to other sectors, and has a contractual relationship with the MOD. It is significant that ACM Sir Mike had no involvement with the MOD's contracts with BCG in office and there is no evidence this work was offered as a reward for decisions made, or actions taken in office. It is also relevant to the Committee's consideration that BCG has a commercial relationship with the MOD and he held a role in the senior leadership at the MOD and therefore held collective responsibility.

6. ACM Sir Mike would have had access to a wide range of privileged information regarding defence and security - in particular, but not limited to aerospace. Given the span of that information and his proximity to decisions at the MOD, he could offer any company working in the defence sector unfair access to information and influence.

7. The Committee<sup>2</sup> agreed with the MOD that there are a number of mitigating factors that help to reduce the risks associated with ACM Sir Mike's access to information and any associated the unfair insight he may offer BCG and its clients:

- the MOD confirmed he withdrew completely from all defence matters from his last day in the role in June 2023;
- it has been 15 months since he has had access to information and decisions within government/the MOD. This reduces the currency of this information;
- he is prevented from drawing on privileged information and has an ongoing duty of confidentiality; and
- there is nothing specific the MOD is aware of that might offer a significant advantage to BCG. This is therefore a general risk associated with his wide ranging and senior role in defence.

8. There remains a risk in relation to his access to information. Whilst the MOD's view is based on having no evidence of a specific risk, it is also not possible to reasonably determine that the former Chief of the Air Staff, one of the most senior leaders within the MOD, retains no sensitive information. ACM's role is focused on defence matters outside of the UK which helps to limit the risk of BCG's clients overlapping with his responsibilities in office, but it does not remove it. Particularly in

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<sup>2</sup> This application for advice was considered by Andrew Cumpsty, Isabel Doherty, Sarah de Gay, Hedley Finn OBE; Dawid Konotey-Ahulu CBE DL; The Rt Hon Lord Eric Pickles; and Mike Weir. Michael Prescott was unavailable.

relation to international operational matters. This risk cannot be entirely assessed given BCG has a range of unknown clients.

9. ACM Sir Mike will have gained contacts within the UK and internationally - including within other governments, militaries and private companies, particularly in defence. As such, there is a risk his network and influence might be used to assist BCG unfairly. The Committee notes it is not his intention to have contact with the MOD in this role, though there remains a significant risk it could be perceived that ACM Sir Mike, as the former Chief of the Air Staff, offers BCG unfair access to the UK MOD and contacts in other governments/defence contractors that it might not otherwise have.

10. It is significant that BCG and ACM Sir Mike confirmed he will not undertake any activities which conflict with ACOBA's advice; and the conditions below will be included in his Senior Advisor Agreement with BCG.

#### The Committee's advice

11. The Committee noted the mitigating factors above that help to reduce the risks associated with ACM Sir Mike's access to information. There is potential for BCG's defence and aerospace work to overlap with his access to information and responsibilities in the UK and internationally. In particular, BCG has a clear interest in the UK defence market and holds contracts with the UK MOD. The Committee therefore agreed with the MOD he should be prevented from working in the UK defence sector, and on matters he was specifically involved with in office, to prevent any direct overlap with his responsibilities in office.

12. He has confirmed there will be no lobbying of the government in this role, in line with the expectations set out in the Rules. To prevent any reasonable suspicion of unfair influence, the Committee has advised that he must not have direct engagement with the MOD in this role. It is significant that BCG has confirmed his separation from its work on UK defence matters, including contact with the UK government/UK MOD.

13. Given the risks outlined and the commercial relationship that exists between the MOD and BCG, the Committee's advice is there should be an appropriate gap between his leaving office and taking up this role. It was considered the 15 months that have now passed since he last had access to information and decision making in office is sufficient. Any remaining risks associated with his access to privileged information and contacts are appropriately mitigated by the conditions set out below.

14. The Committee advises, under the government's Business Appointment Rules, that ACM Sir Mike's role with **Boston Consulting Group** should be subject to the following conditions:

- a waiting period of 12 months, now passed;
- 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 advise Boston Consulting Group or its clients on the UK defence market; and he must not directly engage with the UK MOD/UK government or its arm's length bodies on Boston Consulting Group's behalf (including parent companies, subsidiaries, partners and clients).
- for two years from his last day in Crown service, he should not provide advice to BCG on work with regard to: any policy or operational matter with which he had specific involvement, or for which he had responsibility, in his role as Chief of the Air Staff, or where he had a relationship with the relevant client. This condition does not apply to his work on diversity and inclusion (D&I) matters, on which he is free to advise BCG;
- 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 Boston Consulting Group (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 Boston Consulting Group (including parent companies, subsidiaries, partners and clients);
- for two years from his last day in Crown service, he should not provide advice to Boston Consulting Group (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 or any of its arm's length bodies - including the MOD or its trading funds; 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 office and in foreign governments and organisations for the purpose of securing business/funding or otherwise unfairly advantage Boston Consulting Group (including parent companies, subsidiaries and partners).

15. The advice and the conditions under the government's Business Appointment Rules relate to your 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.

16. 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.

17. 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.*"

18. ACM Sir Mike must inform us as soon as he takes up this work or if it is announced that he will do so. 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.

19. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Yours sincerely,

Cat Marshall  
**Committee Secretariat**

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<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.

## **Annex- material information**

### The role

1. BCG is an international global management consulting firm that works across the public and private sectors, including government. It is one of the Big Three management consultancy firms along with McKinsey & Company and Bain & Company. Its website lists the following as its core industries of focus:
  - Aerospace and Defence
  - Automotive Industry
  - Consumer Products
  - Education
  - Energy
  - Finance
  - Health Care
  - Industrial Goods
  - Insurance
  - Principal Investors and Private Equity
  - Public Sector
  - Retail
  - Technology, Media and Communications
  - Transportation and Logistics
  - Travel and Tourism
2. ACM Sir Mike wishes to take up a paid, part-time role as a Senior Advisor for BCG. ACM Sir Mike said that the BCG Senior Advisor Programme includes over 200 Senior Advisors who provide a set of skills and experiences from a range of backgrounds to help BCG case teams coach, build relationships and advise clients. ACM Sir Mike said his role will be to advise the Managing Partner and leadership team on global Aerospace and Defence; sustainable aviation related to energy transition; and workforce - including diversity, equity and inclusion. ACM Sir Mike said that his role will be international facing, not working in the UK.
3. ACM Sir Mike said he will not be UK government facing in any respect; he will have no involvement in business involving the department or government, in lobbying ministers, advising on how to represent the interests of BCG, nor would he use the military network he gained in office. Further, his contractual terms and conditions will specifically exclude engagement with, or lobbying of, the UK government, and any matter related to BCG's commercial activity.

### Dealings in office

4. ACM Sir Mike said that although the MOD has a contract with BCG, he did not have any involvement in that commercial relationship. He said he was not responsible for any specific policy or regulatory areas regarding BCG 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.
5. ACM Sir Mike said that he has limited interaction with BCG, participating in online seminars every 1-2 months delivered by BCG aimed at technology upskilling for senior leaders.

#### Departmental assessment

6. The MOD said it has had a broad and varied relationship with BCG, which provides a range of services across government, including the MOD. The MOD said:
  - In spite of its relationship with BCG, it is unlikely that ACM Sir Mike had any exposure to information that was commercially sensitive. ACM Sir Mike had no involvement in commissioning work with BCG while in office.
  - The MOD Digital Upskilling course ACM Sir Mike attended is the responsibility of UK Strategic Command, a different part of the department than that for which Sir Mike had overall responsibility (Air Command). He was not responsible for the commercial decisions or running of the contracts - no access to commercially sensitive information as a result.
  - ACM Sir Mike had overall responsibility for Air Command's commissioning work from other consultancies while in office and will have insights into commercial opportunities for such consultancies within UK MOD supply chains.
  - Whilst ACM Sir Mike made no decisions specific to the company, he will undoubtedly have had involvement into and influence over decisions about defence, in particular as they related to aerospace and generally the RAF's operations and capabilities.
  - It is important that his role is internationally focussed, as this helps to mitigate risks in relation to information that would give BCG advantage in gaining business with UK MOD.
7. The MOD recommended standard conditions and:
  - for two years from his last day in Crown service, he should not advise BCG or their clients on the UK defence sector

- for two years from his last day in Crown Service, he should not engage or make any use of his contacts developed in Crown service, to influence policy, secure business/funding or otherwise unfairly advantage BCG over its competitors
- for two years from his last day in Crown service, he should not provide advice to BCG on work with regard to any policy or operational matter he had specific involvement with or responsibility for in his most recent MOD role with an exception of and excluding the work on diversity and inclusion (D&I) matters.