

Cabinet Office
Ministry of Defence

9 October 2026

Paid appointment with Marsh McLennan Companies UK Ltd: Application under the Business Appointment Rules from Mr Andy Start, former Chief Executive of Defence Equipment & Support, Interim National Armaments Director, and Deputy National Armaments Director at the Ministry of Defence.

Thank you for submitting an application for advice under the Business Appointment Rules (the Rules) to the Civil Service Commission (the Commission) on behalf of **Mr Andy Start**, formerly Chief Executive of Defence Equipment & Support (DE&S), Interim National Armaments Director, and Deputy National Armaments Director at the Ministry of Defence (MOD). The application is for a paid, part-time role as **Strategic Advisor at Marsh McLennan Companies UK Ltd (Marsh McLennan)**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Mr Start is a former civil servant at SCS Pay Band 4. His last day of service was 3 April 2026.

The purpose of the Rules is to protect the integrity of the government. They aim to avoid any reasonable concerns that: a civil servant may be influenced in their official duties by the risk of reward; a civil servant may improperly exploit access to information; and an organisation may gain an improper influence through the employment of a civil servant.

In assessing these risks, the Commission evaluated the extent of overlap between Mr Start's former MOD duties and his proposed role. It is significant to note that his role will not be UK-facing whilst he is subject to the Rules. The risk of reward is limited due to Mr Start's non-involvement in any contracts awarded to Marsh McLennan and its subsidiaries. The access to information risk is significant, given Mr Start's high-level strategic visibility over UK procurement requirements, supply chain vulnerabilities, and contractor performance, coupled with Marsh McLennan's active role in the UK defence sector. To mitigate these risks, Mr Start is prohibited from advising on any matter relating to the commercial remit of the MOD, or other government departments, directly relating to UK defence whilst he is subject to the Rules. To prevent improper influence, restrictions are also applied prohibiting him from lobbying, any engagement with government on the company's behalf, or using

contacts acquired in office for business development purposes. These restrictions are applied to Marsh McLennan and its partners, subsidiaries and clients.

The Commission's advice¹ is therefore that the appointment with Marsh McLennan should be made subject to the following conditions:

1. Privileged information – Mr Start 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 the civil service.
2. Lobbying – For two years from his last day in the civil service, until 3 April 2028, Mr Start should not become personally involved in lobbying the UK Government, its arm's length bodies or NATO Command, on behalf of Marsh McLennan (including parent companies, subsidiaries, partners and clients). He should also not use, directly or indirectly, his contacts in the government and/or civil service or NATO Command to influence policy, secure business/funding or otherwise unfairly advantage Marsh McLennan (including parent companies, subsidiaries, partners and clients).
3. Bids and contracts – For two years from his last day in the civil service, until 3 April 2028, Mr Start should not provide advice to Marsh McLennan (including parent companies, subsidiaries, partners and clients) on a bid or contract relating to the UK Government or its arm's length bodies.
4. Engagement with government – For two years from his last day in the civil service, until 3 April 2028, Mr Start should not have any engagement on behalf of Marsh McLennan (including parent companies, subsidiaries, partners and clients) with the UK Government or its arm's length bodies.
5. Limitation to the role – For two years from his last day in the civil service, until 3 April 2028, Mr Start is prevented from advising Marsh McLennan (including parent companies, subsidiaries, partners and clients) on any matter relating to the commercial remit of the MOD, or other government departments, directly relating to UK defence. He must also not advise on any wider matter that was under consideration by the MOD and not yet determined and in the public domain, or matters otherwise not yet in the public domain that he had specific involvement in or responsibility for in developing or determining, during his time in the civil service.
6. Business development – For two years from his last day in the civil service, until 3 April 2028, Mr Start should not become personally involved in lobbying contacts in other governments and organisations he has developed during his time in the civil service for the purpose of securing business for Marsh McLennan (including parent companies, subsidiaries, partners and clients).

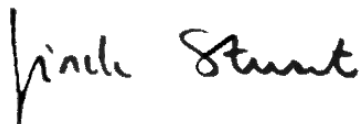
¹ See [Advice under the Business Appointment Rules](#) for details applying to all advice issued by the Civil Service Commission.

Marsh McLennan and Mr Start confirmed their understanding of, and adherence to, the conditions that apply to Mr Start's role.

The Rules set out that civil servants must abide by the Commission's advice. It is Mr Start's personal responsibility to manage the propriety of any appointment and to understand any other rules and regulations he may be subject to in parallel with the Commission's advice.

Should Mr Start be uncertain whether a proposed piece of work falls within the scope of this advice, or if he proposes to extend or otherwise change his role with the organisation, he must return to the Commission to seek further advice. Once this appointment has been publicly announced or taken up, the letter will be published on the Civil Service Commission's website.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gisela Stuart'.

Gisela Stuart

First Civil Service Commissioner

Annex A: The application

1. Marsh McLennan Companies UK Ltd (Marsh McLennan) is a global professional services firm specialising in risk, strategy, and insurance brokerage. It maintains significant policy and contractual relationships across the UK Government. Through its business units, including Oliver Wyman, the firm advises the Ministry of Defence (MOD) and central government on national security, industrial policy, and procurement reform, while also engaging with HM Treasury on financial and insurance market policy.

Applicant assessment

2. As Strategic Advisor, Mr Start's part-time role (approximately 60 days per year) involves advising Marsh McLennan's international business and global client base on strategy execution, risk and opportunity assessment, leadership development, and acting as an independent 'sounding board'. Mr Start stated that the offer arose following an approach by Marsh McLennan's CEO after his retirement announcement.
3. Mr Start confirmed that his role will not focus on the UK defence market as it pertains to MOD, he will abide by the privileged information condition, and will not be involved in contact with, or lobbying of, the UK Government. He stated that his role will not be UK-focused whilst he is subject to the Rules.
4. Mr Start noted that Oliver Wyman was awarded a £1.6 million contract by the MOD in September 2025 to advise on private capital in defence. Mr Start confirmed that this contract was not awarded, nor managed, by DE&S or himself. While the contract lead sat within his overall reporting chain via dual-reporting lines to the Cabinet Office Commercial Function and the National Armaments Director, Mr Start had no direct line management involvement in the contract, no influence on supplier selection, and no role in awarding the contract. Mr Start added that the contract was commissioned and managed by the MOD Department of State growth team, which reports to the Permanent Secretary. His interactions with Oliver Wyman were limited to information sharing relevant to contract delivery.
5. Regarding his interactions with competitors, Mr Start confirmed his primary engagement was limited to Bain & Co in their capacity as strategic advisors to the MOD on defence reform. He stated that any broader interaction with other entities was incidental, limited to attendance at his public speeches, and did not establish relationships that would create a conflict of interest or confer an unfair advantage in his new role.
6. Mr Start served as Chief Executive Officer (CEO) of DE&S from September 2022 to April 2026, during which time he also acted as the Interim National

Armaments Director (September 2024 to September 2025) and Deputy National Armaments Director (September 2025 to March 2026). As CEO and the UK's National Armaments Director, he served as the Accounting Officer directly responsible to Parliament for the stewardship of DE&S resources. Holding delegated authority from the Permanent Under-Secretary of Defence, he led and managed DE&S, including providing equipment and logistic support, delivering acquisition outputs, and ensuring projects met performance, time, and cost targets. In his additional roles as Interim and Deputy National Armaments Director, he oversaw MOD procurement and the support of military materiel, while leading the establishment of the National Armaments Directors (NAD) Group², which integrated with the policies of the Strategic Defence Review³ and Defence Industrial Strategy⁴. Throughout his tenure, he also managed safety, risk, and environmental standards and represented UK interests in international fora, including NATO and the EU.

7. Mr Start said he joined the MOD following an extensive career across global aerospace, space, and defence companies. He added that he was a recognised leading expert in defence, industry, and supply chain structure before his four-year civil service tenure. As such, he considers that his existing foundational knowledge significantly reduces the perception that he would gain unfair benefit from insights or contacts acquired during his time in the MOD.

Correspondence with Marsh McLennan

8. Marsh McLennan confirmed its understanding of, and adherence to, the Commission's advice and the conditions imposed on Mr Start's appointment.

Departmental assessment

9. The MOD and Cabinet Office assessed the risk of this appointment being a reward for past decisions as low. The departments confirmed that Mr Start had no involvement in contract awards to Oliver Wyman, which was handled by a separate team in the MOD.
10. The MOD noted that Mr Start engaged with Oliver Wyman in 2025, including through discussions on defence industrial production and matters of mutual

² The NAD Group brings together the teams responsible for developing, delivering, sustaining, housing and harbouring the UK's 'national arsenal' and defence estate, driving a greater focus on industry partnership, UK-wide economic growth, international collaboration and export opportunities.

³ Ministry of Defence, 'The Strategic Defence Review 2025 - Making Britain Safer: secure at home, strong abroad'

<https://www.gov.uk/government/publications/the-strategic-defence-review-2025-making-britain-safer-secure-at-home-strong-abroad>

⁴ Ministry of Defence, 'Defence Industrial Strategy 2025: Making Defence an Engine for Growth'

<https://www.gov.uk/government/publications/defence-industrial-strategy-2025-making-defence-an-engine-for-growth>

interest, as well as shared participation in industry bodies such as the ADS Group and the Defence Industrial Joint Council.

11. The departments stated that as former CEO of DE&S and National Armaments Director, Mr Start held senior visibility over UK defence capability requirements, supply chain vulnerabilities, procurement challenges, and equipment strategies across every major defence programme. The Cabinet Office highlighted that Oliver Wyman maintains a dedicated defence advisory practice and works on UK defence growth initiatives. As the client portfolio of Marsh McLennan and its subsidiaries includes a range of commercial entities that are unknown, both departments recognised a perception risk that Mr Start could be seen to offer privileged insight to clients with commercial interests in MOD policy or contracts.
12. In considering mitigations for this information risk, the MOD recommended a targeted approach. It stated that Mr Start should not be precluded from working with Marsh McLennan on agreed deliverables provided he does not advise on UK defence matters where he possessed privileged insight during his former roles, or where he had direct relationships or dealings with relevant clients of Marsh McLennan while in post. In contrast, the Cabinet Office recommended a broad restriction prohibiting Mr Start from advising on the UK defence sector whilst he is subject to the Rules. It reasoned that this approach is consistent with his proposed duties and precedent for senior MOD officials, and eliminates the need to speculate on where specific risks lie. It further recommended that Mr Start be restricted from engaging with government on behalf of Marsh McLennan or its clients.
13. The departments were concerned that Mr Start's former seniority could create a perception of unfair access or influence regarding the MOD's industrial strategy and supply chains if he engaged with the department on behalf of Marsh McLennan. Additionally, the departments recommended extending the lobbying ban to NATO Command, reflecting the UK's central role within NATO Command as an extension of the MOD in relevant operational contexts. The departments also agreed that it would be improper for Mr Start to leverage foreign government or military contacts developed solely during his civil service tenure for business development purposes on behalf of Marsh McLennan.

The Commission's analysis

14. *Risk of reward.* While Mr Start held overall responsibility for DE&S resources and UK armaments procurement, the departments confirmed he had no personal involvement in awarding of contracts to Marsh McLennan or its subsidiaries. His interaction with Oliver Wyman was limited to information

sharing relevant to contract delivery. The Commission therefore agreed with the departments' assessment that the risk of this appointment being offered as a reward for past actions or decisions taken in post is low.

15. *Access to information and limitation to the role.* As CEO of DE&S and National Armaments Director, Mr Start held wide strategic visibility over UK defence capabilities, unannounced procurement requirements, supply chain vulnerabilities, and contractor performance. Certain factors reduce the risk around his access to sensitive information, including that five months have passed since his departure and both the June 2026 Defence Investment Plan⁵ and public SME growth targets⁶ have been published. Mr Start's extensive previous career in industry is also relevant. However, a significant residual risk remains. Specifically, commercial procurement cycles in defence span several years, meaning his non-public insights into supplier performance and internal MOD spending trade-offs retain substantial commercial value. There is a risk, real or perceived, that given the overlap between Marsh McLennan's wide-ranging consultancy work in the UK defence sector, and Mr Start's former responsibilities leading the MOD's commercial function, he could provide sensitive information to benefit the organisation's work.
16. The Commission therefore advises that Mr Start does not advise on any matter relating to the commercial remit of the MOD, or other government departments, directly relating to UK defence while he is under the remit of the Rules. It is significant that Mr Start has explained his intention to focus solely on Marsh McLennan's international business during the period he is within scope. This is permitted provided that he adheres to the other conditions outlined in this advice, including that he does not draw on privileged information. Mr Start should return to the Commission if he is uncertain whether a proposed piece of work falls within the scope of this restriction. Mr Start is also prohibited from advising on any wider matter that was under consideration by the MOD and not yet determined and in the public domain, or matters otherwise not yet in the public domain that he had specific involvement in or responsibility for in developing or determining, during his time in the Civil Service.
17. *Improper influence.* Given Mr Start's seniority at the MOD and the relationship of Marsh McLennan's subsidiaries with government, there is a risk that his

⁵ House of Commons Library, 'Defence Investment Plan: Key decisions'
<https://commonslibrary.parliament.uk/research-briefings/cbp-10935/#:~:text=The%20funding%20will%20also%20support%20the%20Uncrewed,Digital%20targeting%20web.%20%2D%20Cyber%20and%20space.>

⁶ Ministry of Defence, 'Red tape to be slashed as MOD launches new team to back British small businesses'
<https://www.gov.uk/government/news/red-tape-to-be-slashed-as-mod-launches-new-team-to-back-british-small-businesses>

professional network could be perceived to provide an unfair advantage. It would be improper for him to be involved in Marsh McLennan's relationships with government or to advise on government work and contracts, including its partners, subsidiaries and clients. While the standard lobbying ban offers some mitigation, the Commission agrees with the departments that this should extend to preventing him from lobbying contacts in NATO Command that he developed as a result of his time in post. The Commission also agrees with the departments' recommendation that, to credibly mitigate the risk of improper influence, an explicit ban on all engagement with government on behalf of Marsh McLennan is necessary for the period Mr Start remains subject to the Rules. The Commission considers it significant that Marsh McLennan confirmed Mr Start's role will not involve lobbying of, or contact with, government.

18. *Business development restriction.* Mr Start's proposed role involves providing opportunity assessment to Marsh McLennan and its clients. While he possesses a wide network developed prior to his recent role, he also holds contacts developed solely as a result of his role in government. The Commission agrees with the restriction to prevent him from lobbying any contacts acquired solely from his time in office for the purpose of securing business for Marsh McLennan.
19. *Waiting period.* As an SCS Pay Band 4 official, Mr Start is subject to a three-month waiting period upon leaving government service in taking up any appointments. This is not applicable as it has been over five months since he left the civil service.