



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Sir John Manzoni, Chairman Mentors International.

1. Sir John former Chief Executive of Civil Service and former Permanent Secretary for the Cabinet Office, has 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 Chairman Mentors International (CMI) as a mentor. The material information taken into consideration by the Committee is set out in Annex A.
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 time in office, alongside the information and influence a former Crown servant may offer CMI.
3. The Rules 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 risks presented

4. When considering this application, the Committee¹ noted that Sir John did not meet with CMI during his time in service and he did not make any decisions directly affecting CMI. Therefore, the Committee considered there is no reason it might be perceived this appointment is a reward for decisions made or actions taken from his time in office.

¹ This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Sarah de Gay; Isabel Doverty; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir; Lord Larry Whitty and Dr Susan Liataud.

5. The Committee noted that this appointment is not directly related to policy or regulation from his time in office, and is drawing on general knowledge, skills and experience. However, as the former Chief Executive of Civil Service and Permanent Secretary for the Cabinet Office, the Committee noted he would have had access to general privileged information which may be seen to be of general use to any company he chooses to join. Specifically the Committee noted due to his role he would have access to sensitive information regarding the Government's planning around the impact of the UK's departure from the EU. The Committee recognised any company operating in the UK and internationally may be considered to be gaining from his insight unavailable to its competitors (such as insight into possible approaches to future trade agreements). However, the Committee considered the level of information seen by Sir John would likely have been high level and not specific to a particular company. Further, the Committee noted Sir John left office before the UK's departure, 13 months have now passed since he had access to information and his role with CMI is limited to being a mentor. The Committee would draw Sir John's attention to the restriction on using privileged information imposed below. The Committee considered that in this context he should specifically avoid giving his new employer privileged insight into the UK's negotiating strategy post its departure from the EU.

6. Additionally, the Committee noted due to Sir John's seniority and influence at the centre of the Government, there is a risk it could be perceived his network and influence might assist CMI unfairly. The Committee would draw Sir John's attention to the standard lobbying restriction and the restriction on providing advice on the terms of a bid or contract relating directly to the work of the UK Government imposed below. However, the Committee noted this was in keeping with his role as described.

7. The Committee also noted that CMI's potential clients are unknown. While the risk is limited the Committee noted it was possible that he may be asked to advise clients who were affected by matters of policy that relate to policy areas he had direct involvement in. Therefore, the Committee imposed a specific condition on this appointment which makes clear that in working with CMI, Sir John should not advise CMI or its clients on work with regard to any policy he had specific involvement or responsibility for as Chief Executive of Civil Service and/or Permanent Secretary for the Cabinet Office.

8. The Committee advises, under the Government's Business Appointment Rules, that Sir John's role with **Chairman Mentors International** 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. In the context of this general provision, the Committee considers he should specifically avoid giving Chairman Mentors International or its subsidiaries, partners or clients, privileged insight based on information from his time in Crown service into Brexit related issues, insofar as it as it pertains to UK's negotiating strategy post its departure from the EU;
- for two years from his last day in Crown service, he should not become personally involved in lobbying the UK Government on behalf of Chairman

Mentors International (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 Chairman Mentors International (including parent companies, subsidiaries, partners and clients);

- for two years from his last day in Crown service, he should not provide advice to Chairman Mentors International (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
- for two years from his last day in Crown service, he should not advise Chairman Mentors International (including parent companies, subsidiaries, partners and clients) on work with regard to any policy he had specific involvement or responsibility for as Chief Executive of Civil Service and/or Permanent Secretary for the Cabinet Office, or where he had a relationship with the company or organisation during his time as Chief Executive of Civil Service and/or Permanent Secretary for the Cabinet Office.

9. 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.

10. 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.*"

11. I should be grateful if you would inform us as soon as Sir John takes up employment with this organisation, or if it is announced that Sir John 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 Sir John has complied with the Rules.

12. Please also inform us if Sir John 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, and where appropriate, refer to it in the relevant annual report.

Yours Sincerely,

Isabella Wynn
Committee Secretariat

Committee Secretariat
Annex A - Material information

The role

1. Sir John sought the Committee's advice on taking up a paid part-time role, with CMI, as a Mentor. Sir John said CMI is a board level mentoring business. CMI is a CEO and board level executives mentoring company founded in 2005. It provides mentoring solutions to senior levels: Board/Executive Committees; Chief Executive Officers; Chief Financial Officers; and Chairmen.
2. Sir John said when asked and when a mentee wishes he will mentor either new Chairs or new Non executive board members (sometimes executive committee members). He said it will involve periodic meetings to discuss general issues around stepping up into new positions, and sharing experience/ leadership pointers for those who wish to have a mentor. He said these meetings will be informal, non-specific and periodic.
3. He also confirmed he will not have contact with government.

Dealings in office

4. Sir John advised the Committee he did not meet with CMI whilst in office and his former department, Cabinet Office has no relationship with CMI. He also told the Committee he did not have any involvement in any relevant policy development or decisions that would have affected CMI and no commercial or contractual responsibilities relating to CMI. Further, he did not meet with competitors of CMI; nor did he have access to sensitive information regarding these competitors.

Department Assessment

5. The Cabinet Office confirmed the details provided by Sir John and confirmed he had no access to specific, policy or other departmental information. However, it did inform the Committee Sir John's role was high profile and senior, and he will have had access to a wide range of information. However, he does not have any information specific to CMI and the fact that he left his official role in April 2020 mitigates any risk.
6. It further said in this role, as a mentor to senior executives, Sir John will draw on his extensive experience of senior leadership roles, including at Board level, from his earlier career in the private sector as well as his five years as Chief Exec of the civil service. As the bulk of his experience lies outside his Civil

Service role, and as the mentoring role will focus on shared experiences of senior leadership roles (rather than on specific policy issues or Government business), it is unlikely to be perceived as a reward.

7. The department has no concerns and recommends the usual restrictions at this level:

- Sir John should not draw on (disclose or use for the benefit of himself or his clients) any privileged information available from his time in the Crown Service;
- A two year lobbying ban.

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