



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Laurence James Mann CBE, former Special Adviser to the Foreign Secretary at the Foreign, Commonwealth and Development Office. Paid appointment with The Office of David Cameron.

1. Mr Mann 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 taking up appointment as the Chief of Staff and Director of the Office of David Cameron.
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 Mr Mann's time in office, alongside the information and influence the former Special Adviser could offer the employer. 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 Rules¹ 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

5. Mr Mann's role within the Office of David Cameron is to operate and manage the business office that supports Lord Cameron's interests. This company was

¹ 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

put on hold while Lord Cameron and Mr Mann returned to government service. This application for advice is not to take up a new role, but to change the role he continued to hold whilst in office as Director of a temporarily dormant company, to the Director and Chief of Staff to the same organisation which will now begin operating again. There is no specific overlap with Mr Mann's responsibilities and decision making at the Foreign Commonwealth and Development Office and he is continuing in the role he left for government service and continuing to work with Lord Cameron. Therefore, the Committee² considered there is no evidence of reward in relation to Mr Mann's role in office.

6. As Special Adviser to the Foreign Secretary, there are inherent risks associated with Mr Mann's access to information and influence, though the risks associated with this internal administrative role managing Lord Cameron's interests are limited.
7. The Committee recognised that separately, Mr Mann noted that some of the interests that will be managed through the Office of David Camron will include future work of Lord Cameron and/or Mr Mann. Both Mr Mann and Lord Cameron will submit applications to ACOBA for advice on any future work, as required under the Rules.

The Committee's advice

8. The Committee determined the risks identified in this application can be appropriately mitigated by the standard conditions below. These make it clear that Mr Mann cannot make use of information or influence gained from his time in Crown service to the unfair advantage of The Office of David Cameron.
9. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **The Office of David Cameron** 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 or any of its arm's length bodies on behalf of The Office of David Cameron (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 The Office of David Cameron (including parent companies, subsidiaries, partners and clients); and

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

- for two years from his last day in Crown service, he should not provide advice to The Office of David Cameron (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 or any of its arm's length bodies.
10. 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' Interests³. 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.
 11. 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.
 12. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant "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."
 13. Mr Mann 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 her role with the organisation as depending on the circumstances, it might be necessary for him to seek fresh advice.
 14. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Cat Marshall
Committee Secretariat

³ 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. The Office of David Cameron is a company set up to administer and support Lord Cameron with his public and private roles /manage his portfolio of interests. Mr Mann previously received advice under the Rules from the department as a Special Adviser below ACOBA level when he left office in Autumn 2016 to take up this same role.
2. Mr Mann said he was allowed to continue in this role during his time in the Foreign Commonwealth and Development Office (FCDO) as a Special Adviser under conflict management arrangements (as agreed by the Permanent Secretary at the FCDO and Propriety and Ethics at the Cabinet Office). The company was dormant during the period that Lord Cameron was Foreign Secretary, but will now operate again.
3. Mr Mann seeks to continue in his role as Chief of Staff/ Director. Mr Mann is seeking advice, as the company has not been operational since both he and Lord Cameron returned to government, during which time the company remained dormant. This application is in respect of it becoming operational again to manage Lord Cameron's interests.
4. Mr Mann said is role in managing The Office of David Cameron,will include:
 - the employment and supervision of staff
 - assisting the Lord Cameron with his public and private activities, including managing his portfolio of interests
 - providing Lord Cameron with political, personal and administrative support.
 - organising Lord Cameron's domestic and foreign travel, and to accompany him as necessary.
 - taking responsibility for the effective running of the office – including all accounting and propriety obligations.
5. Mr Mann said the only contact with government would be any required liaison with 10 Downing Street, the Cabinet Office and the FCDO regarding Lord Cameron's position as the former Prime Minister / Foreign Secretary and his role as a peer. For example, security and protection matters; the official archives; forthcoming travel; freedom of information requests - fact checking matters about Lord Cameron's time in office etc. He said there will be no lobbying government in this role.
6. In future, Mr Mann said he and Lord Cameron will seek advice from ACOBA

for any work that will be administered through The Office of David Cameron.

Dealings in office

7. Mr Mann said that there is no overlap with his role at the FCDO and this role for the Office of David Cameron.

Departmental assessment

8. The FCDO confirmed the details provided by Mr Mann above and recommended the standard conditions.