



**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 PayCargo LLC.**

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 to the Chair of the Advisory Board for PayCargo LLC (PayCargo).
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 to the Foreign Secretary could offer PayCargo. 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 risks presented

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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

5. Mr Mann did not make any policy, regulatory or commercial decisions specific to PayCargo whilst in office. He did not meet with the company in office. There is no known relationship between PayCargo and Mr Mann's former department, the Foreign, Commonwealth & Development Office (FCDO). Therefore, the Committee<sup>2</sup> considered that the risk that this role could be seen as a reward for Mr Mann's decisions in office is low.
6. As Special Adviser to the Foreign Secretary, Mr Mann will have had access to a wide range of privileged information. The risks are limited given there is no direct overlap between Mr Mann's role in government and his proposed role with PayCargo; the FCDO is not aware of any specific information that could provide an unfair advantage to PayCargo.
7. There are risks associated with Mr Mann's influence and network of contacts gained whilst in Crown service. Part of Mr Mann's role with PayCargo is supporting Lord Cameron to advise the board on its global expansion. Mr Mann said that his role will not involve contact with the UK government. However, in supporting Lord Cameron in the company's business development, there is a risk that Mr Mann could draw on his contacts gained in office but outside of government to the unfair advantage of PayCargo LLC.
8. The Committee recognised that Mr Mann wishes to resume his role with PayCargo, having previously been Chief of Staff to the Chair of the Advisory Board from 2022 to 2023, prior to becoming Special Adviser to the Foreign Secretary.

### The Committee's advice

9. The Committee determined the risks identified in this application can be appropriately mitigated by the conditions below. These make it clear that Mr Mann cannot make use of privileged information, contacts or influence gained from his time in Crown service to the unfair advantage of PayCargo.
10. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with **PayCargo LLC** 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;

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<sup>2</sup> 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 become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of PayCargo LLC (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 PayCargo LLC (including parent companies, subsidiaries, partners and clients);
  - for two years from his last day in Crown service, he should not provide advice to PayCargo LLC (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; 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 for PayCargo LLC (including parent companies, subsidiaries and partners).
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 Ministerial Code/Civil Service Code or otherwise.
13. 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

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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.

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. 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.

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

Jess Barrow  
Committee Secretariat

## **Annex- Material Information**

### The role

1. PayCargo is an online financial platform for money moving and information about remittance between payers and vendors in the cargo/ freight logistics industry. Its website says it allows payers, vendors, and freight brokers to settle accounts within a standardised, secure platform. PayCargo is based in the US. PayCargo does not have a known relationship with the UK government.
2. Mr Mann wishes to take up a part-time, paid role as the Chief of Staff to the Chair of the Advisory Board of PayCargo. Mr Mann said his role will be to support Lord Cameron as Chairman of PayCargo's Advisory Board, providing strategic advice with a particular emphasis on international expansion and global risk. Mr Mann said that his role will not involve any contact with the UK government.
3. Mr Mann previously held the role of the Chief of Staff to the Chair of the Advisory Board for PayCargo from 2022- 2023; his role was paused upon his and Lord Cameron's return to government.

### Dealings in office

4. Mr Mann said he did not meet with PayCargo in his capacity as Special Adviser to the Foreign Secretary, nor does PayCargo have a relationship with the FCDO or the UK government. He said that he did not make any policy, commercial or regulatory decisions specific to PayCargo in ministerial office.

### Departmental assessment

5. The FCDO said that you did not make any decisions specific to PayCargo in office, nor did you meet with the company in your role as Special Adviser to the Foreign Secretary. Neither the FCDO nor government have a known relationship with PayCargo.
6. The FCDO noted that with the focus of Mr Mann's role in supporting Lord Cameron in advising PayCargo's board in its global expansion, he could use contacts external to government but gained in office to the unfair advantage of PayCargo.
7. The FCDO recommended standard conditions and a condition to prevent Mr Mann from lobbying contacts gained in office that are outside of government to gain business for the company.