

Cabinet Office

3 November 2025

Paid appointment with the Benefact Group: Application under the Business Appointment Rules from Sir Matthew Rycroft KCMG CBE, former Permanent Secretary at the Home Office.

Thank you for submitting an application for advice under the Business Appointment Rules¹ (the Rules) to the Civil Service Commission (the Commission) on behalf of Sir Matthew Rycroft KCMG CBE, formerly Permanent Secretary at the Home Office. The application is for a paid role as a Senior Adviser with the Benefact Group. Further detail on the content of the application is in the Annex. The Commission's advice is required as Sir Matthew is a former civil servant at SCS Pay Band 4. His last day of service was 28 March 2025.

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.

The Commission's advice is that the appointment should be made subject to the following conditions:

1. Sir Matthew should observe a waiting period of three months from his last day in civil service. This concluded on 28 June 2025.
2. Sir Matthew should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information² available to him from his time in civil service.
3. For two years from his last day in civil service office, until 28 March 2027, Sir Matthew should not become personally involved in lobbying³ the UK government or its arm's length bodies on behalf of the Benefact Group (including parent companies, subsidiaries, partners and clients); nor should Sir Matthew make use, directly or indirectly, of his contacts in the government and/or civil service to influence policy, secure business/funding or otherwise

¹ See the [Business appointment rules for Crown servants](#).

² Meaning official information to which a civil servant has had access as a consequence of his or her office or employment and which has not been made publicly available

³ As defined in the rules.

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unfairly advantage the Benefact Group (including parent companies, subsidiaries, partners and clients).

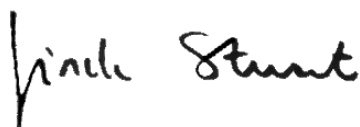
4. For two years from his last day in civil service, until 28 March 2027, Sir Matthew should not provide advice to the Benefact Group, on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of, the UK government or its arm's length bodies.

Sir Matthew and Benefact Group confirmed to the Commission of his intention to fully comply with the lobbying ban that applies to him. Benefact Group stated that 'Sir Matthew's duties are structurally separated from any lobbying activities'.

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

Sir Matthew must inform the Commission as soon as he takes up this work or if it is announced that he will do so. Similarly, Sir Matthew must seek advice if he proposes to extend or otherwise change his role with the organisation. Once this appointment has been publicly announced or taken up, the advice letter will be published on the Civil Service Commission's website.

Yours sincerely,



Gisela Stuart
First Civil Service Commissioner

Annex A: The application

Applicant assessment

1. According to its website, the Benefact Group is an international financial services group that operates in specialist markets, including insurance, investment management, and broking and advisory.⁴ Owned by the Benefact Trust, a registered charity, the group gives all of its available profits to charities and supported causes.
2. As Senior Adviser, Sir Matthew's responsibilities will involve advising the CEO of the Benefact Group on future strategy, including determining the key areas of focus work on. This should include, but is not limited to:
 - Advising potential headline aspirational goals to monitor progress and act as rallying calls / sources of inspiration
 - Identifying the (key) market segments in which the Group's business currently play (as well as potentials for the future)
 - Building a strategy to develop intimacy - deepening its relationships and reach within each of those sectors (and ultimately increasing customer penetration), in particular -
 - Advising how it can best help that sector (for the good of society)
 - Identifying a potential runway of thought leadership topics and/or events
 - Recommending options for its future giving strategy (breadth and depth), and, crucially, how this may be amended to assist future growth
 - Recommend ways in which to move and inspire all its colleagues
 - Recommend ways in which to involve its customers and potential customers
 - Marketing strategy – particularly ways to increase word of mouth referrals, advising moving content for films relevant to growth areas, and its “thank you” strategy⁵.
 - Offering high-level observations on the interplay between the Group's brand, the Trust, and its subsidiaries.
 - Any other observations on the overarching Group strategy in helping each segment/sector, its intention is to build the Benefact and trading brands, helping the businesses grow so that, ultimately, it can give back more.

⁴ <https://benefactgroup.com/>

⁵ Strategy that is primarily centred on converting their commercial success into significant charitable impact, by donating all available profits to causes

3. Sir Matthew confirmed his role will not involve contact with, or lobbying of government. He stated he did not meet with the Benefact Group, nor had involvement in policy development or decisions specific to the organisation. He added that he was not privy to sensitive information that could provide the Benefact Group an unfair advantage.

Departmental assessment

4. As Permanent Secretary, Sir Matthew would have had access to significant amounts of privileged information, including unannounced changes in government policy. However, from the available information, there is no overlap between the work of his department and that of his proposed employer. The department did not highlight any specific information that would be a concern.
5. The Home Office confirmed that Sir Matthew was not involved in any regulatory, policy or commercial decisions specific to the Benefact Group.
6. The Home Office noted that the Benefact Group has retained the services of a registered consultant lobbyist.⁶
7. The Home Office and the Cabinet Office recommendation on Sir Matthew's appointment was for a three-month waiting period from his last day in post (now elapsed) and the standard conditions.

CSC analysis

8. *Risk of reward.* There is no known overlap between Sir Matthew's role as Permanent Secretary and the Benefact Group. He did not meet with the organisation, nor was he involved in decisions specific to the Benefact Group. The Commission agreed with the department's view that the risk that he was offered this role as a reward for decisions or actions taken in office was low.
9. *Access to information.* It is likely that as Permanent Secretary, Sir Matthew had access to a wide range of information that may benefit any organisation, including the Benefact Group. This risk is reduced by the time passed since leaving government service (over six months) and that the Home Office is unaware of any sensitive information he may possess that presents a risk.
10. *Improper influence.* There are risks associated with a former senior civil servant joining an organisation that may seek to influence government. Sir

⁶ https://orcl.my.site.com/CLR_Client_Profile?Id=a084J00000F4gmdQAB

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Matthew stated that his role will not involve contact with, or lobbying of, government. However, as an organisation with a lobbying arm, there is a perception risk that Sir Matthew may be involved in such activities. Sir Matthew and Benefact Group confirmed to the Commission of his intention to fully comply with the lobbying ban that applies to him. Benefact Group stated that 'Sir Matthew's duties are structurally separated from any lobbying activities'.