

*From the Chair*



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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**BUSINESS APPOINTMENT APPLICATION: Jo Churchill, former Minister of State at the Department for Work and Pensions and Government Whip in the House of Commons. Paid appointment with South Lincolnshire Scaffolding Limited.**

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) on taking up an appointment with South Lincolnshire Scaffolding Limited.
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 taken during your time in office, alongside the information and influence a former minister may offer South Lincolnshire Scaffolding Limited. 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 Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, 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. There is no direct overlap with your responsibilities in ministerial office and this role. You did not meet with South Lincolnshire Scaffolding Limited, nor did

you make any decisions specific to the company whilst in office. Importantly, you are returning to a former career you held with South Lincolnshire Scaffolding Limited before joining government. Therefore, the Committee<sup>1</sup> considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.

6. As a former minister, there are inherent risks associated with your access to privileged information, contacts and influence within government. The risks are limited given your former departments confirmed they are not aware of any privileged information you had access to that may offer South Lincolnshire Scaffolding Limited an unfair advantage, you have been out of office for 11 months and you confirmed your proposed role would not involve contact with government.

### The Committee's advice

7. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged information, contacts or influence gained from your time in ministerial office to the unfair advantage of South Lincolnshire Scaffolding Limited.
8. In accordance with the government's Business Appointment Rules, the Committee advises this role with **South Lincolnshire Scaffolding Limited** be subject to the following conditions:
  - you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in ministerial office;
  - for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arm's length bodies on behalf of South Lincolnshire Scaffolding Limited (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service to influence policy, secure business/funding or otherwise unfairly advantage South Lincolnshire Scaffolding Limited (including parent companies, subsidiaries, partners and clients); and
  - for two years from your last day in ministerial office you should not undertake any work with South Lincolnshire Scaffolding Limited (including parent

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<sup>1</sup>This application for advice was considered by Isabel Doverty; Hedley Finn OBE; Sarah de Gay; The Baroness Thornton; and Michael Prescott. Dawid Konotey-Ahulu CBE DL was unavailable.

companies, subsidiaries, partners and clients) that involves providing advice 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 its arm's length bodies.

9. The advice and the conditions under the government's Business Appointment Rules relate to your 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>2</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.
10. 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.
11. 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.*'
12. You must inform us as soon as you take up this role, or if it is announced that you will do so. You must also inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you 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.

Isabel Doverty

**Interim Chair**  
**ACOBA**

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<sup>2</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.

## **Annex – Material information**

### The role

1. South Lincolnshire Scaffolding Limited's website states it is a scaffolding firm based in Lincolnshire, UK. It undertakes all types of scaffolding work for clients across the UK, with a particular focus on heritage scaffolding, scaffold design, commercial scaffolding and temporary roofs. There is no known relationship between South Lincolnshire Scaffolding Limited and the government.
2. In your paid role as Business Services Support, you stated you said you will review company organisational policies in the areas of sustainability and compliance. You said this role will not be customer or external-facing and you will not have any contact with government in this role.
3. You informed the Committee that you co-founded South Lincolnshire Scaffolding Limited in 1997 and worked as a director until joining parliament in 2015.

### Dealings in office

4. You informed the Committee that in your capacity as a minister, you did not meet with, nor were involved in any policy, regulatory or commercial decisions, nor had access to sensitive information specific to South Lincolnshire Scaffolding Limited.

### Departmental assessment

5. The Department for Work and Pensions (DWP) and the Cabinet Office confirmed the details you provided, including that you made no decisions specific to South Lincolnshire Scaffolding Limited and you had no access to information that is likely to offer the company an unfair advantage.
6. DWP stated that a direct departmental relationship with South Lincolnshire Scaffolding Limited is unlikely as the department leases its estate from various landlords. DWP said there is the possibility of a very distant sub-contract relationship with South Lincolnshire Scaffolding Limited.
7. The DWP and Cabinet Office recommended the standard conditions.