



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: David Johnston OBE, former Parliamentary Under Secretary of State at the Department for Education. Unpaid appointment with the Great Friendship Project.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Ministers (the Rules) seeking advice on taking up an unpaid role as the Chair of Trustees at the Great Friendship Project.
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 you may offer the Great Friendship Project. The material information taken into consideration by the Committee is set out in the annex below.
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. When considering this application, the Committee¹ took into account that this appointment as the Chair of Trustees at the Great Friendship Project is

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

unpaid². Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of government by considering the real and perceived risks associated with former ministers joining outside organisations. Those risks include: using privileged access to contacts and information to the benefit of themselves or those they represent. The Rules also seek to mitigate the risks that individuals may make decisions, or take action in office, in expectation of rewards on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.

6. There is no direct overlap between your ministerial responsibilities and your role with the Great Friendship Project as the Chair of Trustees. There remain inherent risks associated with any former minister's access to information, network of contacts and influence in government. In this unpaid role, these risks are limited.

The Committee's advice

7. The Committee did not consider this unpaid appointment to raise any particular concerns under the government's Business Appointment Rules. The standard conditions below sufficiently mitigate the inherent risks. These seek to prevent you from making improper use of privileged information, contacts and influence to the unfair advantage of the organisation.
8. In accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **Great Friendship Project** 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 the Great Friendship Project (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 the Great Friendship Project (including parent companies, subsidiaries, partners and clients); and

² By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

- for two years from your last day in ministerial office you should not undertake any work with the Great Friendship Project (including parent 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' 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.
 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 Ministerial Code or otherwise.
 11. The Business Appointment Rules explain that the restriction on lobbying means that you *'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 employment with this organisation, or if it is announced that you will do so and we will publish this letter on our website. You must 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.

Isabel Doverty
Interim Chair

ACOPA

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 Great Friendship Project (the Project) is a non-profit organisation established in 2021 dedicated to combating the growing issue of loneliness among young adults in London. To achieve its mission, the Project organises a variety of accessible and regular events across the city. These activities are designed to be low-cost or free and include social walks, games nights, pub quizzes, and other informal gatherings.
2. You wish to take up a part-time, unpaid role as the Chair of Trustees. You said this role will guide the Board, support the CEO, and champion their mission to tackle loneliness and build real-world friendships across the UK. As Chair, you will play a pivotal leadership role, helping steer the charity through its next stage of growth. Some of your key responsibilities involve:

Board Leadership & Governance

- Chairing purposeful, inclusive, outcome-driven Board meetings every 1-2 months;
- Leading performance and decision-making evaluations; and
- Providing 1:1 CEO support, fostering leadership and succession planning.

Financial Stewardship

- Overseeing financial health with the treasurer and CEO;
- Reviewing quarterly accounts and long-term forecasts;
- Supporting robust financial planning, risk management, and reporting; and
- Presenting Annual Accounts and ensuring legal compliance.

Strategy & Development

- Guiding the Board in shaping long-term vision and strategy;
- Monitoring objective delivery and mission alignment; and
- Leading trustee recruitment, induction, and development for a high-performing, diverse Board.

Risk & Compliance

- Leading a quarterly Risk Register review and key policy oversight; and
- Ensuring legal and regulatory compliance.

Reporting & Impact

- Overseeing Trustees' Annual Report and supporting the CEO in developing an annual Impact Report; and

- Ensuring meaningful results in program impact, financial sustainability, and fundraising.
3. You stated that it is possible in future there may be contact with government, as the organisation is conducting academic research on loneliness among young people – which government may be interested in.

Dealings in office

4. You said that you did not make any policy, regulatory or commercial decisions specific to the Project, and that you did not have any access to information that could grant the organisation an unfair advantage. You also stated that the Project does not have a relationship with the Department for Education.

Departmental assessment

5. The Department for Education confirmed the details provided in your application and recommended the standard conditions be applied to this role.