



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: www.gov.uk/acoba

October 2025

BUSINESS APPOINTMENT APPLICATION: Jo Churchill, former Minister of State at the Department for Work and Pensions and Government Whip in the House of Commons. Unpaid appointment with the Eastern Education Group.

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 an Ambassador at the Eastern Education Group (the Group).
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 your time in office, alongside the information and influence you may offer the Group. 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 an Ambassador at the Group is 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 Group as an Ambassador. There remain inherent risks associated with any former minister's access to information, network of contacts and influence in government.

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 **Eastern Education Group** 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 Eastern Education Group (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

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

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.

- advantage the Eastern Education Group (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 the Eastern Education Group (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 the advice letter will be published. You must also seek advice if you propose to extend or otherwise change the nature of your role.

Isabel Doherty

**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 Eastern Education Group (the Group) is a multi-academy trust serving Suffolk and the broader region covering primary education to further education.
2. You wish to take up a part-time, unpaid role as an Ambassador at the Group. You stated that as Ambassador, your role will be to champion the education facilities within the Group, including a college, sixth form college and Special Educational Needs facilities. These facilities will be provided to children, young people and adult learners across Suffolk and the broader East of England region.
3. You said you will have no contact with government in your role.

Dealings in office

4. You said that you did not make any policy, regulatory or commercial decisions specific to the Group, and that you did not have any access to information that could grant the organisation an unfair advantage. You also stated that there was no relationship between the Group and the Cabinet Office and Department for Work and Pensions.

Departmental Assessment

5. The Cabinet Office confirmed the details provided in your application.
6. The Department for Work and Pensions confirmed that you did not make any policy, regulatory or commercial decisions specific to the Group, and that you did not have any access to information that could grant the organisation an unfair advantage.
7. Through working at a local level with Jobcentres, or participating in jobs fairs and DWP's Youth Offer⁴, the Department for Work and Pensions noted it may have a relationship with the Group.
8. The Cabinet Office and the Department for Work and Pensions recommended the standard conditions.

⁴ www.gov.uk/guidance/help-to-find-work-for-universal-credit-claimants-aged-18-to-24