



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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Sir Nicholas MacPherson
HM Treasury
1 Horse Guards Road
London
SW1A 2HQ

30 May 2014

Dear Sir Nicholas

BUSINESS APPOINTMENT APPLICATION: JULIA CHURCH

The Committee has been asked to consider an application from Julia Church, the former Special Adviser to the Chief Secretary to the Treasury. She is seeking permission to set up as an independent consultant. As you will be aware, Mrs Church left Crown service on 3 March 2014. She hopes to begin work as soon as her application has been approved. The Rules require that, as a former Special Adviser, Mrs Church's applications be considered by the Advisory Committee, which provides advice to the relevant Permanent Secretary for a decision.

The Committee noted that Mrs Church's consultancy services will focus on offering strategic advice, policy research and analysis of UK public policy. This will include providing advice on the priorities of political parties, the broader policy environment and on how clients may wish to contribute to wider political and policy-making processes. The Committee also considered her application to take up a commission with Hanover.

The Committee took into account that Mrs Church has stated that she has had no official contact with Hanover. She has not had any contractual dealings with Hanover during her last two years of employment, and was not responsible for anyone who did. She has had no access to commercially sensitive information about any competitors of her prospective employer. Mrs Church has not had access to any information about related policy or commercially sensitive information nor has she had access to information relating to competitors of Hanover which could be regarded as being commercially valuable or sensitive.

The Committee has noted that there is no formal relationship between Hanover and HM Treasury, although it is conceivable that some of Hanover's clients may lobby the department on specific issues. However HM Treasury is content that there is therefore no significant or meaningful relationship between Hanover and the department.

The Committee has taken into consideration the fact that Mrs Church has said that she will not lobby Ministers or government officials. She confirmed that she will not be seeking to influence the outcome of government decisions or legislation on behalf of clients and that she will not be drawing on privileged information made available to her as a Special Adviser.

The Committee's recommendation is that the application and commission with Hanover be approved subject to the conditions that:

- Mrs Church should not draw on privileged information available to her as a Special Adviser;
- for two years from her last day of service, Mrs Church should not become personally involved in lobbying UK Government on behalf of her new employer or its clients;
- for six months from her last day as a Special Adviser she should submit a fresh application for any commission she wishes to accept with individuals, companies or organisations in policy areas within her remit as Special Adviser to the Chief Secretary to the Treasury and
- once she has received approval to set up as an independent consultant, she must seek confirmation from the **Committee directly** that each individual commission is permissible under the terms of her consultancy before taking it up. If, after enquiry, the Committee takes the view that a commission is, or may be, outside the terms of the consultancy she will be expected to submit a fresh application.

The Business Appointment Rules define lobbying in the following way: "Lobbying in this context means that the former civil servant should not engage in communication with Government – including Ministers, special advisers and officials – with a view to influencing a Government decision or policy in relation to their own interests, or the interests of the organisation by which they are employed, or to whom they are contracted".

As with all Special Advisers, the Committee makes its recommendation on the understanding that Mrs Church will be required, if she has not done so already, to confirm in writing to the Department that she recognises that she will continue to be bound by the provisions of the criminal law which protect certain categories of information, including the Official Secrets Act, and by her duty of confidentiality to the Crown.

I should be grateful if you could let us know if you are content to accept the Committee's recommendations, and also ensure that we are copied in to the letter to Mrs Church informing her of the outcome of her application.

I should also be grateful if you would ensure that we are informed as soon as Mrs Church takes up the appointment, or if it is announced that she will do so (I enclose a form for this purpose). We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments which have not been taken up or announced, and this could lead to a false assumption being made about whether she had complied with the rules.

Finally, if, after having taken up the appointment, it is proposed that Mrs Church's work with Hanover changes or is expanded in any way, she should inform the Committee as, depending on the circumstances, she may need to submit a fresh application.

Once the work has been publicly announced or started, we will publish details of this letter on the Committee's website and include the main details of the appointment, together with the Advisory

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Committee's advice on it and the date on which it was taken up, in both the regularly updated consolidated list on the website and in the next annual report.

Yours sincerely

Carrie Aitken
Committee Secretariat