



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Ms Elizabeth Honer, former Chief Executive and Head of the Government Internal Audit Function at the Government Internal Audit Agency (GIAA). Paid appointment with the London Strategy Centre.

1. Ms Honer sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Crown Servants (the Rules) on taking up a role with the London Strategy Centre (LSC) as Advisor, Strategy and Performance.
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 Ms Honer's time in office, alongside the information and influence she may offer the LSC. 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 Rules set out that Crown servants must abide by the Committee's advice¹. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

¹ Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code

The Committee's consideration of the risks presented

5. HM Treasury (HMT)² confirmed Ms Honer had no official dealings with the company during her time as Chief Executive of the GIAA; nor did she make any decisions specific to the company. The Committee³ considered the risk this appointment could reasonably be perceived as a reward for decisions made or actions taken in office is low.
6. Given Ms Honer's role at GIAA, she will have had access to generally sensitive information across government. HMT did not consider Ms Honer has access to any sensitive information specific to LSC and the Committee noted this is a general risk, rather than specific to this role.
7. As in all applications, there is a risk that Ms Honer's network and influence might assist LSC unfairly in regard to providing access to government. Though her role is focused outside of the UK, reducing the likelihood of this risk arising.
8. There are also risks related to LSC's unknown clients - should Ms Honer advise clients she had contact with during her time government, or if she were to advise on matters she had involvement in whilst in government. The Committee considered the potential for overlap on the specifics of her work is limited given her role at the GIAA. The LSC has also confirmed it will ensure the Rules and conditions imposed will be adhered to.

The Committee's advice

9. The risks in this application are limited. In line with the Committee's usual approach to addressing the risks associated with LSC's unknown clients, the Committee imposed a condition to prevent Ms Honer working on any policy or operational matter she had specific involvement in whilst she was at the GIAA.
10. The Committee considered the other risks associated with her privileged access to information, contacts and influence gained in Crown service are sufficiently mitigated by the other conditions below.
11. The Committee's advice, under the Government's Business Appointment Rules, that this appointment with **London Strategy Centre** should be subject to the following conditions:

² GIAA is an executive agency, sponsored by His Majesty's Treasury.

³ This application for advice was considered by Andrew Cumpsty; Sarah de Gay; Isabel Doverly; The Rt Hon Baroness Jones of Whitchurch; The Rt Hon Lord Pickles; and Mike Weir.

- she should not draw on (disclose or use for the benefit of herself for the persons or organisations to which this advice refers) any privileged information available to her from her time in Crown service;
 - for two years from her last day in Crown service, she should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of the London Strategy Centre (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage the London Strategy Centre (including parent companies, subsidiaries, partners and clients);
 - for two years from her last day in Crown service, she should not provide advice to the London Strategy Centre (including parent companies, subsidiaries, partners and clients) 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 any of its arm's length bodies; and
 - for two years from her last day in Crown service, she should not advise the London Strategy Centre or its clients on any work with regard to any policy she had specific involvement in or responsibility for as Chief Executive and Head of the Government Internal Audit Function at the Government Internal Audit Agency, nor where she had a relationship with the relevant business during her time as Chief Executive and Head of the Government Internal Audit Function at the Government Internal Audit Agency.
12. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's previous roles in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. It is an applicant's personal responsibility to understand any other rules and regulations she may be subject to in parallel with this Committee's advice.
13. 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.
14. 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.'

15. Please inform us as soon as Ms Honer takes up employment with this organisation. Please also inform us if she proposes to extend or otherwise change the nature of her role as, depending on the circumstances, it may be necessary for her to make a fresh application. 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.

Yours sincerely,

Hamzah Rizvi
Committee Secretariat

Annex - Material Information

The role

1. Ms Honer stated the London Strategy Centre is a newly-formed consultancy and executive education organisation, in the areas of strategy, leadership and innovation. Its clients are private and public sector organisations in the Middle East, mainly Saudi Arabia. Its website states their programmes operate in 5 key areas: Strategy, Leadership, Innovation, Commercial and Military.
2. In her paid, part-time role as Advisor, Strategy and Performance, Ms Honer stated she will advise London Strategy Centre on the design and content of consultancy or education projects for clients in the Middle East, mainly in Saudi Arabia, in the areas of strategy, performance and leadership. She stated the intent is that she is also part of the team delivering the projects on the ground, acting as a consultant and/or trainer.
3. She said there is no expectation of her drawing on knowledge of any specific policy areas from the UK government, nor on any sensitive information she may have been privy to while CEO of GIAA. She will have no contact with government in the role.

4. She added her advice will draw on her former academic education in strategy development and implementation, change management and organisational performance. It will also draw on her practical experience as a CEO in developing and delivering an effective strategy and the leadership required to do so.
5. Ms Honer said she was put in contact with the CEO of London Strategy Centre, Dr Imran Zawwar, by a professor at Cranfield School of Management, who is aware of her expertise in strategy and performance.
6. London Strategy Centre told the Committee that it was interested in Ms Honer's experience of working in a complex environment and *...not interested in exploiting any privileged information or contacts that [Ms Honer] gained while working for the UK government.* It also confirmed it would ensure the Rules and conditions imposed on Ms Honer will be adhered to.

Dealings in office

7. Ms Honer stated she attended a couple of evening lectures and networking events at the Arab British Chamber of Commerce at the invite of Dr Zawwar, but did not have any official dealings with the London Strategy Centre during her time in office. Further, she did not make any policy or regulatory decisions, nor does she have access to sensitive information specific to, nor is there a departmental relationship with the London Strategy Centre.

Departmental Assessment

8. HM Treasury confirmed the details Ms Honer provided and:
 - that she was not involved in any policy or decisions specific to the London Strategy Centre;
 - the department does not have a relationship with the London Strategy Centre; and
 - that she does not have access to sensitive information specific to the London Strategy Centre.
9. The FCDO was consulted because of the possible foreign engagements and stated it considers the application to be low risk and cannot see any potential conflict of interest between Ms Honer's current role and the proposed role with LSC.