



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: Ms Elizabeth Honer, former Chief Executive & Head of the Government Internal Audit Function, Government Internal Audit Agency (GIAA). Unpaid appointment with Royal Academy of Dance.

1. Ms Honer sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Crown Servants (the Rules) on an unpaid role she wishes to take up with Royal Academy of Dance (RAD).
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 a former Crown servant may offer RAD. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee has advised that a number of conditions be imposed to mitigate the potential risks to government associated with this appointment under the Rules. The Committee's advice is not an endorsement of this application in any other respect.
4. The Rules¹ set out that Crown servants must abide by the Committee's advice. 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.

The Committee's consideration of the risks presented

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

5. When considering this application, the Committee² took into account this appointment as a member of the Finance, Audit and Risk Committee is unpaid³. 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 Crown servants 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 to 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 known policy, regulatory or commercial overlap between her role in office and this role. There is no suggestion she would have access to information that would unfairly benefit the organisation.

The Committee's advice

7. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. The standard conditions below, which seek to prevent her from drawing on her privileged information and using her contacts to the unfair advantage of her new employer, will sufficiently mitigate the risks in this unpaid appointment.
8. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **Royal Academy of Dance** subject to the following conditions:
 - She should not draw on (disclose or use for the benefit of herself or 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 Royal Academy of Dance (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage Royal Academy of Dance (including parent companies, subsidiaries, partners and clients);
 - For two years from her last day in Crown service, she should not provide advice to Royal Academy of Dance on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of the

² This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Sarah de Gay; The Rt Hon Baroness Jones of Whitchurch; The Rt Hon Lord Eric Pickles; and Mike Weir..

³By 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.

UK government or any of its arm's length bodies.

9. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's previous role in government only; there are separate rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Commissioner for Standards⁴. 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. Ms Honer must inform us as soon as she takes up this work or if it is announced that she will do so. Similarly, she must inform us if she proposes to extend or otherwise change her role with the organisation as depending on the circumstances, it might be necessary for her to seek fresh advice.
13. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Yours sincerely

Jessica Barrow
Committee Secretariat

Annex - Material information

The role

1. The Royal Academy of Dance (RAD) is a dance training and education organisation that provides teacher training and examinations for dance schools internationally. RAD is a registered charity. RAD has previously received funding from Department for Digital, Culture, Media and Sport from

⁴ All Peers and Members of Parliament are prevented from paid lobbying under the Parliamentary Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your obligations under the Code can be sought from the commissioners for standards

the Culture Recovery Fund⁵ for covid recovery. As an education provider, RAD is also regulated by OFSTED.

2. Ms Honer said that she is interested in dance and so wrote to the Chief Executive of RAD to ask if there was a role that would make use of her skills. She was subsequently offered a role on the Finance, Audit and Risk Committee. The role is unpaid and will be part time (around 5 days a month).
3. Ms Honer said that RAD is interested in her general professional expertise in finance, audit and risk. There is no expectation of her using her government contacts or insights gained in her role as CEO of GIAA. There will be no contact with government in her role.
4. Ms Honer noted she previously worked in arts administration..

Dealings in office

5. Ms Honer advised the Committee that she did not meet with, nor was she involved in any impact on policy or regulatory or commercial decisions specific to the RAD.

Department assessment

6. HM Treasury confirmed the details provided by Ms Honer in her application. The department confirmed it had no concerns and recommended the standard conditions.

⁵ <https://www.royalacademyofdance.org/app/uploads/2022/03/08161125/Financial-Report-2020-21.pdf>