

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 Cranfield School of Management.

- 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 Cranfield School of Management as Visiting Fellow, Strategy 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 Ms Honer's time in office, alongside the information and influence she may offer the Cranfield School of Management. 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.

The Committee's consideration of the risks presented

5. HM Treasury (HMT)² confirmed Ms Honer had no official dealings with the Cranfield School of Management during her time as Chief Executive of the

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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

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

- GIAA; nor did she make any decisions specific to the organisation. 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 former 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 the Cranfield School of Management and the academic, non-commercial nature of this role limits the risks associated with his access to information..
- 7. There are inherent risks associated with Ms Honer's contacts and influence within government. The Committee noted her does not involve contact with government and she is joining an academic institution in non-commercial capacity.

The Committee's advice

- 8. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Rules. There are inherent risks associated with Ms Honer's access to sensitive information and contacts which the standard conditions below appropriately mitigate. In particular, they prevent her from drawing on her privileged information and using her contacts and influence within government to the unfair advantage of the Cranfield School of Management.
- 9. In accordance with the government's Business Appointment Rules, the Committee advises that this role with **the Cranfield School of Management** be 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 its arm's length bodies
 on behalf of the Cranfield School of Management (including parent
 companies, subsidiaries, partners and clients); nor should she make use,
 directly or indirectly, of her contacts in the government and/or ministerial office
 to influence policy, secure business/funding or otherwise unfairly advantage
 the Cranfield School of Management (including parent companies,
 subsidiaries, partners and clients); and
- for two years from her last day in Crown service, she should not undertake any work with the Cranfield School of Management (including parent

³ This application for advice was considered by Andrew Cumpsty; Isabel Doverty; Hedley Finn OBE; Sarah de Gay; The Baroness Jones of Whitchurch; Dawid Konotey-Ahulu CBE; The Rt Hon Lord Eric Pickles: Michael Prescott; and Mike Weir.

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.

- 10. 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 he may be subject to in parallel with this Committee's advice.
- 11. 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.
- 12. 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.'
- 13. 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. The Cranfield School of Management is a leading post-graduate business school. According to its website, the Strategy Group⁴ conducts and applies

⁴ https://www.cranfield.ac.uk/som/expertise/strategy

world-leading research on strategic processes, practices, and capabilities in a wide range of organisational settings.

- 2. As Visiting Fellow, Strategy Group, Ms Honer stated that:
 - The role is an honorary one, to recognise senior expertise in the areas of strategy, performance and complexity.
 - It can involve as much or as little engagement with the school as my time and their opportunities permit. She stated that the organisation (specifically Professor Andrey Pavlov) is keen to bring her executive experience of senior leadership in complex environments (in my case, parliament and government) into Professor academic teaching in other words to link practice with theory. This is likely to involve acting as an external examiner on strategy and performance for MBA students, occasional lectures on her experience of developing and implementing strategies in complex environments, and bringing practical experience to academic research.
 - She has confirmed her role will not involve contact with government.
- 3. Ms Honer stated that her role as Visiting Fellow, Strategy Group is mainly unpaid, for example when acting as an external examiner for MBA students or taking part in alumni events. She has nevertheless stated the role may involve remuneration, if she is invited to give lectures.
- 4. Ms Honer stated that she has confirmed with the organisation that there is no expectation of her drawing on any policy knowledge from her time within government or from her time at the GIAA, nor any expectations that she would use her contacts in government for commercial gain or for lobbying government.
- 5. Ms Honer stated that whilst it is not a return to a former career as such, but a return to the place at which she studied for her MSc in Managing Organisational Performance and at which she started a research PhD. She stated she has continued to engage in these areas of research interest and retained contact with her former professors informally. She added it is in this capacity, as an alumni, that they are interested in her, combined with her subsequent senior executive career.

Dealings in office

6. Ms Honer advised the Committee that she did not meet with, nor was she involved in policy or regulatory decisions specific to the Cranfield School of Management. She stated she does not have access to sensitive information specific to, nor is there a departmental relationship with the organisation.

Departmental Assessment

- 7. HMT confirmed the details Ms Honer provided and:
 - that she was not involved in any policy or decisions specific to the Cranfield School of Management;
 - the department does not have a relationship with the organisation; and
 - that she does not have access to sensitive information specific to the organisation.
- 8. HMT did not have concerns regarding Ms Honer's appointment and recommended the standard conditions.