



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: John Alty CB, former Director General and Interim Permanent Secretary for Department of International Trade. Appointment with the Institute of Export and International Trade.

1. Mr Alty 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 Institute of Export and International Trade (the Institute) as a Trustee Director. The material information taken into consideration by the Committee is set out in the annex.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during Mr Alty's time in office, alongside the information and influence he may offer the Institute.
3. 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

4. When considering this application, the Committee² took into account this role as a Trustee Director 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 the government by considering the real and perceived risks associated with former ministers using privileged access to

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

² This application for advice was considered by Jonathan Baume; Andrew Cumptsy; Sarah de Gay; Isabel Doverty; The Rt Hon Lord Pickles; Richard Thomas; Dr Susan Liataud; Mike Weir; Lord Larry Whitty.

³ 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.

contacts and information to the benefit of themselves or those they represent; and 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.

5. As the former Director General and Permanent Secretary, the Committee noted he would have had access to privileged information. Specifically the Committee noted that due to his role he would have access to sensitive information regarding development and delivery of UK trade policy. The unpaid nature of the role and the nature of the organisation is relevant here - The Institute is a registered charity looking to educate and train companies to trade effectively, sustainably and competitively, and its work aligns with the government's interests.

The Committee's advice

6. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. The standard conditions below, preventing Mr Alty from drawing on his privileged information and using his contacts to the unfair advantage of their new employer, will sufficiently mitigate the risks in this case. The Committee would draw his attention to the below lobbying and contracts and bids ban that prevent Mr Alty from using the contacts you made while in government to the unfair advantage of the Institute.
7. The Committee advises, under the Government's Business Appointment Rules, that Mr Alty's role with the **Institute of Export and International Trade** should be subject to the following conditions:
 - He should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time in Crown service;
 - for two years from his last day in Crown service, he should not become personally involved in lobbying the UK government on behalf of Institute of Export and International Trade (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage the Institute of Export and International Trade (including parent companies, subsidiaries, partners and clients); and
 - for two years from his last day in Crown service, he should not provide advice to Institute of Export and International Trade (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.

8. 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.
9. 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.*"
10. I should be grateful if you would inform us as soon as Mr Alty takes up employment with this organisation, or if it is announced that Mr Alty will do so, either by returning the enclosed form or by emailing the office at the above address. We shall otherwise not be able to deal with any enquiries, since we do not release information about appointments that have not been taken up or announced. This could lead to a false assumption being made about whether Mr Alty has complied with the Rules.
11. Please also inform us if Mr Alty proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him to make a fresh application.
12. 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,

Isabella Wynn
Committee Secretariat

Annex - Material information

The role

1. The website states the Institute was established over 85 years ago to support UK businesses in growing their international markets and trade. The Institute is a membership organisation and states it is the leading association of exporters and importers. It provides education and training to professionalise the UK's international traders.

2. The Institute is a registered charity and partners with the UK government, to deliver national and international programmes, it says it acts ‘...as evangelists for the UK and establishing UK processes and standards globally’. The website states the Institute co-partners in running the online Customs Academy, the world’s first training platform dedicated to customs skills and developed at the request of HM Revenue & Customs (HMRC).
3. Mr Alty seeks to join as an unpaid Trustee. He said the Trustees are responsible for governance of the Institute and setting its strategy. He said he would need to attend 6 Board meetings per year, and could expect to perform some representative roles from time to time. Given that the Institute is concerned with trade he said he will be discussing within the Institute aspects of trade policy or trade more widely. However, stated in advising the Institute he would not disclose any privileged information.
4. Mr Alty said the Institute has aims which coincide with those of the government in terms of promoting exports and international trade. Generally, the Institute is concerned with raising the professionalism of businesses and their employees in managing their export business. It also represents its members’ views on policy from time to time. Contacts with the Department for Trade and other government departments would normally be made by the executive rather than the Trustees. Mr Alty said he has explained to the Institute the standard conditions that would be imposed on his appointments and the organisation accepts this. He said it may be possible that he could attend events at which government representatives are present.

Dealings in office

5. Mr Alty said he had one meeting with the Institute at their request during his time as Permanent Secretary, during the first half of 2021. This was an introductory meeting to its work. Mr Alty said he did not meet with competitors of the Institute.
6. Mr Alty informed the Committee:
 - there were contracts between firms providing the International Trade Adviser service and IOE&IT (for example help desk and helpline support, CPD recording). He stated these contracts were funded by The Department for International Trade (DIT) but not with DIT;
 - most International Trade Advisers are members of the the Institute and their membership subscriptions, which are paid by their employers, he said these may have been funded by DIT;
 - the Institute has also developed courses for UK Export Finance, which is a body which reports to SoS DIT, though it is a separate Department.
 - DIT staff members also have access to training provided by the Institute.
7. Mr Alty said these are long standing arrangements which are not decided by DIT.

8. Mr Alty said as Perm Sec and previously he has had no role in letting contracts to the Institute. He said these were in effect subcontracts let by contractors to DIT. He confirmed he had no involvement in decisions specifically affecting the Institute and had no access to sensitive information that could provide an unfair advantage.

Department Assessment

9. DIT confirmed the details Mr Alty provided and confirmed his meetings with the Institute. It also confirmed it has a contractual relationship with the Institute and said the Institute is a subcontractor of HSG - on contract to HSG for the provision of knowledge transfer service. HSG provides DIT's Export Support Service (ESS).- a telephone helpline and digital enquiry service that helps British businesses export. The department confirmed Mr Alty had no involvement with the letting of the ESS contract to HSG.
10. Given Mr Alty was Interim Permanent Secretary, the Cabinet Office also considered this application. It confirmed as an interim Permanent Secretary of DIT, Mr Alty had knowledge of a wide range of departmental information. However, the department confirmed he left this position in August 2021, so - after 8 months - '*...the salience of the information is likely to have significantly degraded*'. Furthermore, the department said the Institute is a charity set up to support UK businesses in growing their international markets and trade - rather than a directly commercial organisation with direct competitors. It seeks to support HMG policy in a number of areas - e.g. increasing exports, it considers the risks involved in this appointment to be low.
11. Both the Cabinet Office and DIT confirmed it did not have any concerns and recommended the standard conditions.