



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

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**BUSINESS APPOINTMENT APPLICATION: John Alty CB, former Director General and Acting Permanent Secretary of the Department for International Trade (now the Department for Business and Trade). Paid appointment with the Pagefield Communications Limited (Pagefield).**

1. John 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 Pagefield as an Adviser.
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 John Alty's time in office, alongside the information and influence a former Director General and Acting Permanent Secretary of the Department of International Trade may offer Pagefield. 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<sup>1</sup> 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 risk presented

5. Mr Alty did not have any contact with Pagefield during his time in office and there is no contractual relationship between Pagefield and his former

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<sup>1</sup> 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.

department. The Committee<sup>2</sup> therefore considered the risk this appointment could reasonably be perceived as a reward for decisions or actions taken in office is low.

6. Mr Alty stated that he would be expected to advise Pagefield's clients on issues such as the implications of Brexit and wider UK trade policy, and how to engage effectively with government on public policy matters. Under the Rules it would not be improper for Mr Alty to advise on UK trade policy, drawing on knowledge, skills and experience gained from his service at the Department of International Trade. The Committee carefully considered the risks with the overlap between this proposed role and his time working within this area in government.
7. As former Director General and Acting Permanent Secretary of the Department of International Trade, Mr Alty would have had access to a wide range of privileged information regarding UK trade policy. This raises real and perceived risks he may offer Pagefield and its clients unfair insight. However, the Committee noted that there are two significant mitigating factors that lower the risks associated with Mr Alty's access to sensitive information regarding UK trade policy:
  - a. Mr Alty has been outside of Crown service for over 21 months
  - b. There has been two changes in administration (i.e two new Prime Ministers and changing Cabinets)
8. There is a risk his network and influence in government might assist Pagefield unfairly. The Committee acknowledged that Mr Alty's role will not involve lobbying government, though he noted that it is possible that he may attend events on behalf of Pagefield where government officials could be present. Attending such events would not be inconsistent with the lobbying ban applied under the Rules, however Mr Alty should not engage directly with government on behalf of Pagefield - as it would be difficult to mitigate the risk this could be perceived as lobbying, given the company's lobbying work.
9. Additionally, given Pagefield is registered as a lobbying firm by the Office of the Register of Consultants and Lobbyists, it is significant that the CEO of Pagefield confirmed Mr Alty's role will be separated from the lobbying arm of its business and that Pagefield will abide by the conditions imposed on Mr Alty.
10. The Committee recognised that potential clients using Pagefield's services are unknown. It is possible that he may be asked to advise clients affected by matters he had direct involvement or oversight of.

### The Committee's advice

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<sup>2</sup> This application for advice was considered by Jonathan Baume; Isabel Doverty; Sarah de Gay; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir; and Lord Larry Whitty. Andrew Cumpsty was absent.

11. Whilst Pagefield will undoubtedly gain from his skills and experience in trade policy, the risk he could use sensitive information to unfairly Pagefield are appropriately mitigated by the conditions below, which seek to prevent the use of privileged information and contacts gained in office.
12. Given the unknown nature of Pagefield's clients the Committee has imposed a condition to prevent Mr Alty from working on matters he had specific involvement or responsibility for in office.
13. Further, whilst it is significant that Pagefield has confirmed adherence to the conditions below; and that Mr Alty will not be involved in its lobbying business- the Committee advises that Mr Alty must not initiate direct engagement with government on Pagefield's behalf.
14. The Committee's advice, under the government's Business Appointment Rules, that Mr Alty's role with **Pagefield Communications Limited** should be subjected to the following conditions:
  - he should not draw or (disclose or use for the benefit of himself or the persons or organisation 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 Pagefield Communications Limited (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in government and or ministerial contacts to influence policy, secure business/funding or otherwise to unfairly advantage Pagefield Communications Limited (including parent companies, subsidiaries, partners and clients);
  - for two years from his last day in Crown service, he should not provide advice to Pagefield Communications Limited (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; and
  - for two years from his last day in Crown service, he should not advise Pagefield Communications Limited (including parent companies, subsidiaries, partners and clients) on work with regard to policy he had specific involvement or responsibility for as Director General and Acting Permanent Secretary for the Department for International Trade, or where he had a relationship with the company or organisation.
15. 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.

16. 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*'.
17. You must inform us as soon as Mr Alty takes up employment with this organisation, or if it is announced that he will do so. 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.
18. 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,

**Xante Chalwell**  
**Committee Secretariat**

## **Annex - Material information**

### The role

1. Mr Alty said that Pagefield is a public affairs and public relations company. Pagefield's website states that it is an independent communications consultancy specialising in integrated campaigning, public affairs and corporate and brand communications. Pagefield is registered as a lobbying firm by the Office of the Register of Consultants and Lobbyists
2. Mr Alty said he would take up a paid, part-time role as an Adviser. He described the role as advising Pagefield's clients on the implications of Brexit, on wider UK trade policy, and how Pagefield's clients can effectively engage with government on public policy matters of relevance to their business.

3. Mr Alty said his role does not involve lobbying the government and that he may attend events where government officials could be present.

#### Dealings in office

4. Mr Alty did not have any contact with Pagefield during his time in office and did not consider he worked on policy, made decisions, or had access to information of specific relevance to Pagefield.

#### Department Assessment

5. The department confirmed the details provided by Mr Alty and confirmed that he had no contact with Pagefield.
6. The department stated that Mr Alty has been out of office and away from decision making and access to information for over 21 months (31 August 2021-present). The department considers his access to relevant sensitive information is limited given the amount of time outside of Crown service. Further, the department noted this appointment can be carried out without use of confidential information and based on his general knowledge of the civil service and government.
7. The department recommended this appointment be subject to standard conditions.

#### Correspondence from Pagefield to the Committee

8. Mr Oliver Foster, CEO of Pagefield wrote to the Committee and said the following:

*'We have invited John Alty to join Pagefield as a Senior Advisor on a part-time basis from June 2023. For your background, Pagefield is a corporate communications and public affairs campaigning agency established in 2010. We are PRCA-registered, abiding by its code of practice alongside our adherence to the Registrar of Consultant Lobbyists.*

*As an agency, alongside our many other services, we do engage in lobbying activity, declared in the appropriate way, on behalf of our clients. Equally, we also advise our clients as to their own lobbying activity without our direct support.*

*John's role with Pagefield will, initially, be to advise us internally as well as our clients directly on general matters relating to trade policy, issues arising from the UK's new trade deals around the world, as well as helping us and our clients to continuously improve our understanding of the machinery of government.*

*At no point between now and the end of John Alty's ACOBA two-year restrictive period (in August 2023) will he be asked by us to represent Pagefield or our clients to anyone in government. Moreover, we appreciate and accept that also during this*

*period, John Alty will not be able to offer advice on specific policy decisions he has been involved with in government.*

*We are fully supportive of and respect the restrictions set out by ACOBA. Indeed, as an agency that has always signed up to and abided by the industry codes on lobbying, we believe ACOBA is a vital part of that wider infrastructure that's required to ensure transparency in lobbying.'*