



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: acoba@acoba.gov.uk

Website: <http://www.gov.uk/acoba>

October 2025

BUSINESS APPOINTMENT APPLICATION: Sir Philip Barton GCMG OBE, former Permanent Under-Secretary at the Foreign, Commonwealth and Development Office. Paid appointment with SC Strategy Ltd.

1. Sir Philip 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 his proposed role with SC Strategy Ltd (SC Strategy) as a Senior 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 Sir Philip took during his time in office, alongside the information and influence he may offer SC Strategy. 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 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.

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 risk presented

5. Sir Philip did not make any policy, regulatory, operational or commercial decisions specific to SC Strategy, nor did he meet with the company whilst in office. Therefore, the Committee² considered that the risk that this role could reasonably be seen as a reward for his decisions in office was low.
6. Sir Philip will have had access to a wide range of sensitive information, including the work of UK intelligence agencies and foreign affairs. This potentially overlaps with the work of SC Strategy, given it is an international strategy and geopolitical advisory consultancy. The Committee considered that Sir Philip Barton could, or be seen to, offer an unfair advantage to SC Strategy given he was a Permanent Under-Secretary at the FCDO that had close ties to UK intelligence agencies and the work of the company is focused on corporate intelligence gathering.
7. The Committee agreed with the Cabinet Office that there are factors limiting the risks associated with Sir Philip's access to information:
 - the risk around his access to information is general rather than there being any specific information identified;
 - he has had no access to commercially sensitive information relating to SC Strategy and/or its competitors; and
 - he has been out of office for seven months, creating a gap between his access to information and his role with SC Strategy.
8. SC Strategy's clients and the precise pieces of work that Sir Philip will undertake are unknown, which means there is a risk he could work on matters overlapping with specific access to information or decision making in office. It is significant that SC Strategy confirmed in writing its understanding of, and agreement to comply with, the Committee's advice.
9. Sir Philip has a network across government and he could be seen to offer SC Strategy and its clients unfair access to, and influence within, government. Sir Philip confirmed his work with SC Strategy excludes any lobbying of the UK government – which all former senior Crown servants are prevented from doing for two years under the government's Rules.

The Committee's advice

10. Due to the nature of the unknown clients Sir Philip will be advising, the Committee has imposed a condition which makes clear that in working with

² This application for advice was considered by Isabel Doverty; Hedley Finn OBE; Michael Prescott; and The Baroness Thornton. Sarah de Gay and Dawid Konotey-Ahulu CBE DL were unavailable.

SC Strategy and its clients, Sir Philip should not advise on intelligence, policy, or operational matters which he had specific involvement in or responsibility for as Permanent Under-Secretary at the FCDO.

11. The Committee determined that the remaining risks identified in this application can be appropriately mitigated by the conditions below. These make it clear Sir Philip cannot make use of privileged information, contacts or influence gained from his time in Crown service to the unfair advantage of SC Strategy or its clients.
12. The Committee's advice, under the government's Business Appointment Rules, that this role with **SC Strategy Ltd** 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 or its arm's length bodies on behalf of SC Strategy Ltd (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service contacts to influence policy, secure business or otherwise unfairly advantage SC Strategy Ltd (including parent companies, subsidiaries, partners and clients);
 - for two years from his last day in Crown service, he should not provide advice to SC Strategy Ltd (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 its arm's length bodies; and
 - for two years since his last day in office, he should not advise SC Strategy Ltd or its clients on any work with regard to intelligence, policy, or operational matters which he had specific involvement in or responsibility for as Permanent Under-Secretary at the Foreign, Commonwealth & Development Office or where he had a relationship with the relevant client during his time as Permanent Under-Secretary at the Foreign, Commonwealth & Development Office.
13. The advice and the conditions under the government's Business Appointment Rules relate to Sir Philip's previous role in government only; they are separate from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the

Registrar of Lords' Interests³. 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.

14. 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 Ministerial Code/Civil Service Code or otherwise.
15. 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."*
16. Sir Philip must inform us as soon as he takes up this work or if it is announced that he will do so. Similarly, he must seek advice if he proposes to extend or otherwise change his role with the organisation.
17. Once this appointment has been publicly announced or taken up, this advice will be published.

Samantha Ria Shahriar
Committee Secretariat

Annex- material information

The role

1. Sir Philip said that SC Strategy is a London-based international strategy and geopolitical advisory consultancy.
2. It advises a range of senior public and private sector clients in the UK and overseas on policy and strategy issues, with a focus on geopolitical advisory

³ All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

services. Its website says that it has built its advisory services around four key areas:

- Geopolitical analysis and advice
 - Policy, strategy and planning
 - Intelligence reporting
 - Disputes and investigations
3. It employs and works with some former government officials, particularly from the intelligence, diplomatic and defence communities, who also work as academics within the space⁴. SC Strategy's unknown clients are listed as confidential on its website but include the finance sector, corporates, law firms, individuals and foreign governments.
 4. Sir Philip wishes to take up a paid, part-time role with SC Strategy as a Senior Adviser. Sir Philip said that his role will be to engage with senior clients to support their understanding of geopolitical developments and to contribute to the analytical work of SC Strategy. He said that he will expect to draw on the skills and experience gained from his time in UK public service but he will not be asked to draw on any privileged information, or to engage in any lobbying of government ministers and officials.
 5. SC Strategy confirmed in writing its understanding of, and agreement to comply with, the Committee's advice. It stated that his role will be limited to engaging with senior-level clients to support their understanding of geopolitical developments and contributing to the analytical work of the company – this will not include providing advice on matters that overlap with his time in Crown service, as set out in the conditions.

Dealings in office

6. Sir Philip said that he did not meet with SC Strategy whilst in office, nor did his former department have a relationship with the company. He said that he did not make any policy, regulatory or commercial decisions whilst in office that were specific to SC Strategy.

Departmental assessment

7. The FCDO confirmed that it does not have a relationship with SC Strategy, nor did Sir Philip meet with the company whilst in office. The FCDO noted SC

⁴ <https://www.scstrategy.co.uk/who-we-are>

Strategy does not appear on the list of registered consultant lobbyists⁵, nor has it been a client of one⁶. It has no known government contracts. The FCDO noted SC Strategy has provided written advice in response to Parliamentary inquiries⁷.

8. The FCDO said:

- there is no specific direct overlap between Sir Philip's proposed role with SC Strategy and his time in office;
- Sir Philip had no access to commercially sensitive or valuable information relating to SC Strategy's competitors; and
- Sir Philip would have had access to a wide range of information, including some linked to the work of intelligence agencies that could be potentially relevant to SC Strategy/its clients. Given SC Strategy's clients are confidential, it is difficult to determine if there is any specific knowledge that may offer SC Strategy an unfair advantage.

9. The FCDO noted the possible perception risk with the former Permanent Under-Secretary at the FCDO who was accountable and sponsored by intelligence agencies joining an organisation that employs other former members of the intelligence and defence communities, and focuses on corporate intelligence gathering.

10. The department recommended the standard conditions and:

- the three month waiting period expected as a former Permanent Secretary (now elapsed); and
- a restriction which prevents him from advising on intelligence, policy, or operational matters which he had specific involvement in or responsibility for as Permanent Under-Secretary at the FCDO.

11. It also stated that contact with UK government should be through official channels only.

⁵ https://orcl.my.site.com/clr_search?consultancy=SC+&tab=1#search-consultants-tab

⁶ https://orcl.my.site.com/clr_search?client=sc+strategy&tab=2#search-clients-tab

⁷ <https://committees.parliament.uk/writtenevidence/113833/pdf/>