

**Baroness Stuart of Edgbaston  
First Civil Service Commissioner  
Civil Service Commission**

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Cabinet Office

26 January 2026

**Application to establish an independent consultancy under the Business Appointment Rules from Sir Philip Barton GCMG OBE, former Permanent Under-Secretary, Foreign, Commonwealth and Development Office.**

Thank you for submitting an application for advice under the Business Appointment Rules (the Rules) to the Civil Service Commission (the Commission) on behalf of **Sir Philip Barton GCMG OBE**, formerly Permanent Under-Secretary, Foreign, Commonwealth and Development Office (FCDO). The application is to establish an **independent consultancy**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Sir Philip is a former civil servant at SCS Pay Band 4. His last day of service was 17 February 2025.

The purpose of the Rules is to protect the integrity of the government. They aim to avoid any reasonable concerns that: a civil servant may be influenced in their official duties by the risk of reward; a civil servant may improperly exploit access to information; and an organisation may gain an improper influence through the employment of a civil servant.

The Commission's advice<sup>1</sup> is that the appointment should be made subject to the following conditions:

1. Privileged information – Sir Philip 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 the civil service.
2. Lobbying – For two years from his last day in office, until 17 February 2027, Sir Philip should not become personally involved in lobbying the UK Government or its arm's length bodies on behalf of his independent consultancy (including parent companies, subsidiaries, partners and clients). He should also not use, directly or indirectly, his contacts in the government and/or civil service to influence policy, secure business/funding or otherwise unfairly advantage his

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<sup>1</sup> See [Advice under the Business Appointment Rules](#) for details applying to all advice issued by the Civil Service Commission.

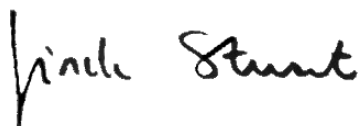
independent consultancy (including parent companies, subsidiaries, partners and clients).

3. Bids and contracts – For two years from his last day in the civil service, until 17 February 2027, Sir Philip should not provide advice to any company or organisation on behalf of his independent consultancy on a bid or contract relating to the UK government or its arm's length bodies.
4. Independent consultancy – For two years from his last day in civil service, until 17 February 2027, before accepting any work for his Independent consultancy and or/before extending or otherwise changing the nature of his work, he should seek advice from the Commission. The Commission will decide whether each piece of work is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules. This excludes work that falls into the following categories: academic roles (such as teaching and lecturing); or ad hoc speaking engagements. In these cases, the other conditions outlined in this letter will still apply.

The Rules set out that civil servants must abide by the Commission's advice. It is Sir Philip's personal responsibility to manage the propriety of any appointment and to understand any other rules and regulations they may be subject to in parallel with the Commission's advice.

Sir Philip must seek advice if he proposes to extend or otherwise change his role with the organisation. Once this appointment has been publicly announced or taken up, the letter will be published on the Civil Service Commission's website

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gisela Stuart'.

**Gisela Stuart**  
First Civil Service Commissioner

## **Annex A: The application**

### Applicant assessment

1. As Permanent Under-Secretary at the FCDO, Sir Philip was:
  - Responsible for overall leadership, management, and performance.
  - The department's Principal Accounting Officer accountable to Parliament.
  - Head of the Diplomatic Service, leading all UK Ambassadors, High Commissioners, and diplomats globally.
2. Sir Philip stated that he will be setting up his own consulting service. He outlined that he will offer advice and services in leadership; academic teaching and lecturing; organisational resilience, risk management and foresight; ad hoc speaking engagements; and geopolitical strategy.
3. Sir Philip stated his consulting work will not involve contact with, or lobbying of, government.
4. Sir Philip stated his first potential client is the London School of Economics and Political Science (LSE). The work involves two seminars and joining a negotiation exercise for the LSE International Diplomacy Executive Academic Service (LSE IDEAS) Executive Masters in Diplomacy. He stated that as Deputy Ambassador in Washington, he hosted alumni events for the US chapter of the LSE Alumni Association.

### Departmental assessment

#### **Independent consultancy**

5. As Sir Philip is developing a new business, the FCDO and Cabinet Office did not consider him to have had any involvement in decisions specific to his consulting work.
6. The FCDO and Cabinet Office did not consider Sir Philip to possess sensitive information that may present an unfair advantage to clients of his consulting work.
7. The departments noted that, as the applicant said that the consultancy will involve the applicant providing 'geopolitical strategy' and 'organisational resilience, risk management and foresight', this could overlap within the remit of Sir Philip's former department. The departments said that he should be required to return to request advice for the clients and commissions he wishes to accept to his consultancy.

8. The FCDO recommended the standard conditions.

### **Commission with LSE**

9. The FCDO confirmed it had no concerns with previous relationships between the applicant and LSE.
10. The departments recognised that while Sir Philip would still retain privileged information from his time in service, it is unlikely this could provide an advantage to LSE.
11. The departments noted that while the applicant organised events for an Alumni Network that falls within LSE during his time at the FCDO, it is unlikely that this previous association would lead to criticism or objections from competitors of the prospective employer.

### **CSC analysis**

#### **Independent consultancy**

12. *Risk of reward.* As Sir Philip is establishing a new company, meaning the risk of reward for decisions or actions taken in office is likely to be low.
13. *Access to information.* Sir Philip will have had access to a wide range of information, which could provide an unfair advantage to clients of his independent consultancy. This risk is reduced by the time passed since leaving government service (over ten months) and that the departments are not aware of any sensitive information he may possess that presents a risk. However, the Commission notes that risks will be most significant where Sir Philip seeks to provide advice on matters where he had a relationship with the client, or had access to relevant sensitive information, while in office. The requirement to return to the Commission for advice on each new client, outside the low-risk criteria outlined, will allow the Commission to scrutinise these risks on a case-by-case basis.
14. *Improper influence.* As a senior official, there is a risk that Sir Philip's government contacts may present an unfair advantage to potential clients of his consulting work. Given the lobbying ban that applies to all former senior civil servants, Sir Philip cannot have contact with ministers or officials that could reasonably be seen as seeking to influence government. It is significant to note that Sir Philip stated he would not have contact with government as part of his consulting work. The risks relating to lobbying and/or involvement in government bids and contracts are mitigated by the standard conditions.

15. *Independent consultancy.* This advice provides Sir Philip consent to set up an independent consultancy, subject to a number of conditions. The proposed scope of his consultancy overlaps with the substance of his time in office. As advised by the government's BARs guidance, before accepting any work for his independent consultancy and or/before extending or otherwise changing the nature of his work, he should seek advice from the Commission. However in this instance, this will exclude work that falls under the following categories: academic roles (such as teaching and lecturing), or ad hoc speaking engagements. In these cases, the other conditions outlined in this letter will still apply.
16. *Waiting period.* As a former SCS Pay Band 4 official, Sir Philip is subject to a three month waiting period upon leaving government service in taking up any appointments or establishing an independent consultancy. As Sir Philip left the civil service over ten months ago, this period has elapsed.

### **Commission with LSE**

17. *Risk of reward.* Sir Philip was not involved in decisions specific to LSE during his time in post. As such, the risk of reward is likely to be low.
18. *Access to information.* Sir Philip will have had access to a wide range of information, which could provide an unfair advantage to clients of his independent consultancy. However, the departments recognised that while Sir Philip would still retain privileged information from his time in service, it is unlikely this could provide an advantage to LSE.
19. *Improper influence.* Sir Philip's role with LSE does not involve contact with, or lobbying of the UK government on behalf of the organisation. The Commission considered the standard conditions sufficiently mitigate the risks in relation to his initial work with LSE.