

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

1 Horse Guards Road, London, SW1A 2HQ  
E-Mail [bars@csc.gov.uk](mailto:bars@csc.gov.uk)



Foreign, Commonwealth and Development Office

11 December 2025

**Unpaid appointment with the Heywood Foundation: Application 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 at the Foreign, Commonwealth and Development Office (FCDO). The application is for an unpaid, part-time role as a **Trustee** at the **Heywood Foundation**. 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 the Heywood Foundation (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

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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.

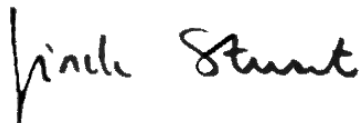
advantage the Heywood Foundation (including parent companies, subsidiaries, partners and clients).

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 the Heywood Foundation on a bid or contract relating to the UK government or its arm's length bodies.

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. According to its website, the Heywood Foundation works to support charitable causes, in particular the promotion of diversity and innovation within the civil service and broader public service in the UK.
2. As a Trustee, Sir Philip stated he will be responsible for governance and strategy, legal and compliance (in relation to charity law), financial oversight, acting in best interests, and prudence and accountability.
3. Sir Philip stated that his role will not involve lobbying government. He does, however, expect to have contact with officials over the Heywood Foundation's work.
4. 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.
5. Sir Philip said he was not responsible for any regulatory, funding or commercial decisions specific to the Heywood Foundation during his recent time in the civil service.

### CSC analysis

6. *Application level.* As a Level 1 application for an unpaid role, the Commission's analysis applies the principle that this category of appointment is generally recognised as posing a lower risk to government integrity.
7. *Risk of reward.* The role of a Trustee at the Heywood Foundation is unpaid. Sir Philip stated he had no involvement in policy development, decisions, or contractual/commercial decisions affecting the Heywood Foundation while at the FCDO. Therefore, the risk that the offer was made as a reward for decisions made during his time in office is low.
8. *Access to information.* Sir Philip would have had access to a wide range of information from his former role. This risk is mitigated by the standard waiting period and the fact that over eight months have passed since his last day in civil service, reducing the currency of any information he may still hold. The standard condition regarding privileged information covers any remaining risks presented by his access to information.

9. *Improper influence.* Sir Philip would retain contacts in government, which could be used to provide an unfair advantage. However, the role is unpaid and Sir Philip stated that he will not lobby on behalf of the organisation, although he would expect to have contact with government officials over the Foundation's work. The lobbying ban that applies to all former senior officials for two years on leaving office does not prevent all contact with government. However, in this role he must not directly, or indirectly, lobby the government for changes to policy, contracts or funding, as to do so would risk granting the Heywood Foundation an unfair advantage. The standard conditions, which would prevent the improper use of his government contacts to unfairly benefit the organisation, sufficiently mitigates the risks.
10. *Waiting period.* As an SCS4 official, Sir Philip is subject to a three month waiting period upon leaving government service in taking up any appointments. This is not applicable as it has been eight months since he left the civil service.