

Ministry of Defence

15 January 2026

Unpaid appointment with the Royal British Legion: Application under the Business Appointment Rules from Mr Paul Lincoln CB OBE VR, former Second Permanent Secretary at the Ministry of Defence.

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 **Mr Paul Lincoln CB OBE VR**, formerly Second Permanent Secretary at the Ministry of Defence (MOD). The application is for an unpaid role as an Appointed Trustee of the **Royal British Legion (RBL)**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Mr Lincoln is a former civil servant at SCS Pay Band 4. His last day of service was 9 May 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 advice¹ is that the appointment should be made subject to the following conditions:

1. Privileged information – Mr Lincoln 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 9 May 2027, Mr Lincoln should not become personally involved in lobbying the UK Government or its arm's length bodies on behalf of the RBL (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 the RBL (including parent companies, subsidiaries, partners and clients).
3. Bids and contracts – For two years from his last day in the civil service, until 9

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

May 2027, Mr Lincoln should not provide advice to the RBL 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 Mr Lincoln's personal responsibility to manage the propriety of any appointment and to understand any other rules and regulations he may be subject to in parallel with the Commission's advice.

Mr Lincoln 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,

S. K. Owen.

Kate Owen
Chief Executive

Annex A: The application

Applicant assessment

1. According to its website, the Royal British Legion (RBL) is the UK's largest Armed Forces charity. It has 180,000 registered memberships, with 110,000 volunteers and a network of partners and charities.
2. As an Appointed Trustee, Mr. Lincoln will serve as an active Board member. His role involves providing leadership and shaping strategy, as well as offering independent oversight, guidance, and expertise. He will:
 - Legally be accountable for the RBL's charitable purpose, legal compliance, governance, and approving the Annual Report.
 - Collaborate with the Executive Board and fellow Trustees to develop, review, and constructively challenge the RBL's strategic direction.
 - Ensure integrity of financial information, robust controls, and risk management systems.
 - Assess, monitor, and advise on mitigation for the RBL's risk profile.
 - Engage with stakeholders to champion the RBL's purpose, communicate strategy, and explain public benefit.
 - Promote ethical behaviour, diversity/inclusion, and uphold the RBL's values/conduct standards.
 - Commit to engagement, development, and participation in Board performance evaluation and Trustee appraisals.
3. While Mr Lincoln stated he will not lobby government in this role, he anticipates having contact with senior military officials through the RBL's work to support the Armed Forces Community, particularly at events hosted by the charity.
4. Mr Lincoln was Second Permanent Secretary of the Ministry of Defence (MOD), between August 2023 and March 2025. In this role he stated that his responsibilities included digital transformation across defence, security and resilience (including cyber security), space policy, science and technology, safety, defence strategy, net assessment and challenge, trade and economic security, and strategic relationships with industry. He was also responsible for the MOD Head Office budget.
5. Mr Lincoln said he was responsible for running the D-Day80 commemorations, during which he had contact with the RBL due to their significant involvement in the event.

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 as an Appointed Trustee at the RBL is unpaid. Although Mr Lincoln had contact with the RBL as the senior responsible owner for the D-Day80 commemorations, he stated he had no involvement in making contractual and commercial decisions that affected the charity. Mr Lincoln also applied for the role via an advertised post. 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.* Mr Lincoln would have had access to a wide range of information in his former role. This risk is limited by the seven months that 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.* Mr Lincoln would retain contacts in government, which could be used to provide an unfair advantage. However, the role is unpaid and Mr Lincoln stated that he will not lobby on behalf of the RBL, although he would expect to have contact with senior military officials at events. The lobbying ban that applies to all former senior officials 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 RBL 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, Mr Lincoln 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 seven months since he left the civil service.