

Cabinet Office

10 February 2026

Paid appointment with Strategy International Holdings Ltd: 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 a paid, part-time role as **Chair of the Advisory Board at Strategy International Holdings Ltd (Strategy International)**. 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 advice¹ 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 Strategy International (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 Strategy International (including parent companies, subsidiaries, partners and clients).

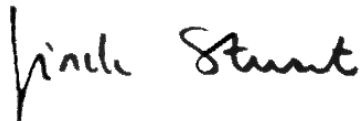
¹ See [Advice under the Business Appointment Rules](#) for details applying to all advice issued by the Civil Service Commission.

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 Strategy International 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, Strategy International is a holding company providing business networking and trade consultancy to UK-registered firms. The group coordinates five interlinked organisations:
 - The D Group, which provides leadership insights through a network of business and government leaders;
 - British Expertise International, which identifies emerging market export opportunities for the infrastructure sector;
 - British Foreign Policy Group, a think tank conducting research on UK foreign policy and enterprise;
 - The Future Leaders Group, which delivers executive development and C-suite training; and
 - Defence Impact, a not-for-profit fostering partnerships between UK business and the Armed Forces.
2. As Chair of the Advisory Board, Sir Philip stated he will chair the Advisory Board meetings three times a year. He stated that the Board has no governance responsibilities or formal standing and serves purely to provide input on global business challenges and advise Strategy International and its business networks on current issues. His specific responsibilities include providing strategic analysis of geopolitical trends and international events and evaluating their potential impact on members of Strategy International's business networks. Additionally, he will facilitate domestic and international contacts to assist members in their understanding of, and response to, these developments.
3. Sir Philip stated that his role will not involve any contact or dealings with government. He said that Strategy International does not lobby government.
4. As Permanent Under-Secretary at the FCDO, Sir Philip was responsible for overall leadership, management, and performance of the department. He was also the department's Principal Accounting Officer accountable to Parliament and 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 Strategy International in his previous role.

Departmental assessment

6. The FCDO and the Cabinet Office noted that Sir Philip's position as a member of the Advisory Board at Strategy International had previously been considered by the Advisory Committee on Business Appointments (ACOBA). The current application marks Sir Philip's move from an unpaid board membership to a remunerated position as Chair.
7. The FCDO and the Cabinet Office confirmed that Sir Philip did not meet with Strategy International during his time in office.
8. While the departments noted that Sir Philip did not have direct engagement with Strategy International during his role, they acknowledged he may have encountered its members in their capacity as government contractors or suppliers. The FCDO and Cabinet Office assessed the risk of reward as low, noting that any relevant contract bids would have been subject to standard, objective commercial procurement processes.
9. The FCDO and Cabinet Office noted Sir Philip's prior contact with competitors of Strategy International and his access to policy in development. However, they concluded that the potential for unfair advantage can be sufficiently mitigated by the standard conditions.

CSC analysis

10. *Risk of reward.* The Commission noted that Sir Philip's role with Strategy International was previously considered by ACOBA in an unpaid capacity. Although this new appointment is remunerated and involves a move to chair the Advisory Board, the Commission found that the role's core responsibilities remain largely unchanged. Sir Philip did not meet with the organisation while in office, and any contact with members of Strategy International would have been limited to routine stakeholder engagement. Further, neither the FCDO nor the Cabinet Office raised concerns regarding the appointment. Consequently, the Commission agreed with the departments that the risk of this role being perceived as a reward for past actions is low.
11. *Access to information.* As the former Permanent Under-Secretary and Head of the Diplomatic Service, Sir Philip had access to high-level, sensitive policy information. While this creates a potential for unfair advantage to Strategy International and its member organisations, the Commission determined that the standard conditions are sufficient to mitigate the associated risks.
12. *Improper influence.* Given his former seniority, Sir Philip could retain a network of contacts in government which could be used to provide an unfair

advantage. While Sir Philip stated his role will involve facilitating contacts for Strategy International, the Commission noted that his role will not involve contact with government. Sir Philip has confirmed he has not, and will not, provide government contacts in his roles with Strategy International, which would be prohibited under the Rules. The Commission considered the risk of influence is mitigated by the standard conditions.

13. *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 no longer applicable as it has been eleven months since he left the civil service.