

Ministry of Defence

10 February 2026

Paid appointment with Baringa Partners LLP: Application under the Business Appointment Rules from Mr Paul Lincoln CBE 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 CBE OBE VR**, formerly Second Permanent Secretary at the Ministry of Defence (MOD). The application is for a paid role as a Strategic Advisor with **Baringa Partners LLP (Baringa)**. 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 with Baringa Partners 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 office.
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 Baringa Partners (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 Baringa Partners (including parent companies, subsidiaries, partners and clients).
3. Bids and contracts – For two years from his last day in the civil service, until 9 May 2027, Mr Lincoln should not provide advice to Baringa Partners (including

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

parent companies, subsidiaries, partners and clients) on a bid or contract relating to the UK government or its arm's length bodies.

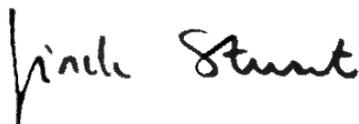
4. Engagement with government – For two years from his last day in the civil service, until 9 May 2027, Mr Lincoln should not have any engagement on behalf of Baringa Partners (including parent companies, subsidiaries, partners and clients) with the UK government or its arm's length bodies.
5. Limitation to the role – For two years from his last day in civil service, until 9 May 2027, Mr Lincoln is prevented from advising Baringa Partners or its clients on work regarding any policy or operational matter that he had a material role in developing or determining, or where he had a material relationship with the relevant client, during his time as Second Permanent Secretary at the Ministry of Defence.

Mr Lincoln and Baringa Partners confirmed to the Commission of his intention to fully comply with the lobbying ban that applied to him. Baringa Partners also confirmed its understanding of, and adherence to the remaining conditions that apply to Mr Lincoln's role.

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,



Gisela Stuart
First Civil Service Commissioner

Annex A: The application

Applicant assessment

1. According to its website, Baringa Partners is a global management consultancy firm with hubs across Europe, the United States, Asia, and Australia. The company operates in various sectors, including financial services, government and the public sector.
2. Baringa Partners currently and historically contracts across a range of government departments, including with the Ministry of Defence, Department for Transport, Home Office, NHS England, and HM Revenue and Customs.
3. As Strategic Advisor, Mr Lincoln's role will include supporting strategy development and translating strategic vision into actionable initiatives; testing business priorities, risks and opportunities; supporting the establishment of new areas of business; supporting Baringa Partners' senior leadership, teams, and individuals on individual projects; supporting the positioning of projects, challenging for value for money, deliverability and delivery excellence; and facilitating strategic workshops and planning sessions with senior leaders.
4. Mr Lincoln said his role will not involve contact with, or lobbying of, the UK Government.
5. Mr Lincoln stated that his relationship with the defence and security industry while Second Permanent Secretary was broad and strategic, focused on whole sectors rather than individual companies. He noted that Baringa Partners is not a defence or security company.
6. Mr Lincoln noted he had contact with Baringa Partners in 2024, though this was limited to his role as a judge on the 'Collaboration' award panel for the Civil Service Awards, which the company sponsored. Significantly, he stated that he had no involvement in policy development or decisions specific to Baringa Partners and was not privy to sensitive information that could provide the company with an unfair advantage.

Departmental assessment

7. The MOD confirmed that Baringa Partners previously held a £1.14 million contract to provide consultancy support on the Future Combat Air System programme. This contract concluded in September 2025; the department confirmed the company holds no active contracts.

8. The MOD stated that as Second Permanent Secretary Mr Lincoln had contact with management consultancy firms, though not with Baringa. The department stated that in his former role, Mr Lincoln interacted with a range of companies to discuss the strategic requirements of the department, though not the detail of specific programmes or contracts. This was held elsewhere. The MOD noted Mr Lincoln's interaction with Baringa Partners as he stated, and confirmed that, separate from his declared sole interaction, he was not involved in any other policy, regulatory or commercial decisions specific to the company.
9. The MOD did not consider Mr Lincoln to possess sensitive information that could present an unfair advantage to Baringa Partners.
10. The MOD stated that Mr Lincoln has influence and connections at the highest level of the department, including leaders in supply chains to the MOD and Home Office.
11. The MOD recommended the standard conditions as well as:
 - A restriction on Mr Lincoln having any engagement with the UK government on behalf of Baringa Partners.
 - Limitations to his role, including prevention from advising on matters relating to MOD or NATO supply chains or any policy or operational matter he had specific involvement or responsibility for as Second Permanent Secretary at the Ministry of Defence, or where he had a relationship with the company or organisation during his time at the Ministry of Defence.

CSC analysis

12. *Risk of reward.* As Second Permanent Secretary, Mr Lincoln held broad strategic influence over MOD decisions. However, the department confirmed he was not involved in any decisions specific to Baringa Partners, nor those affecting its competitors. As such, the Commission agreed with the MOD's assessment that the risk of this role being offered as a reward for actions taken in office is low.
13. *Access to information.* It is likely that as Second Permanent Secretary, Mr Lincoln had access to a wide range of information that could benefit Baringa Partners. This risk is limited in this case as the MOD does not consider Mr Lincoln to possess sensitive information that may provide an unfair advantage specifically to the company. In addition, whilst Baringa Partners has contracted with the MOD previously, it is not a defence and security company and so the risk of policy overlap with Mr Lincoln's former role is less overt. Further, the length of time passed since leaving government service (over nine months), reduces the sensitivity of any information Mr Lincoln may still possess.

14. *Limitation to the role.* Baringa Partners is a management consultancy operating in various sectors with unknown clients. Although the risk relating to his access to information is general, the risk becomes more acute should he advise the company on matters that overlapped with his official responsibilities. To mitigate this risk, the Commission agreed with the MOD's recommendation that Mr Lincoln be prevented from advising Baringa Partners or its clients on work regarding any policy or operational matter that he had a material role in developing or determining, or where he had a relationship with the relevant client, during his time as Second Permanent Secretary at the MOD. In line with the MOD, the Commission agrees that this extends to being prevented from advising Baringa Partners on UK MOD or NATO supply chains.
15. *Improper influence.* There are risks associated with a former senior civil servant joining an organisation that has existing commercial relationships with government and that may seek to further expand its commercial presence. It would be improper for the former Second Permanent Secretary of the MOD to be involved in Baringa Partners' relationships with government or in advising on work/bids related to government. This is prevented by the standard conditions.
16. *Engaging with government.* Mr Lincoln stated that his role will not involve contact with, or lobbying of, government. Mr Lincoln and Baringa Partners confirmed to the Commission their intention to fully comply with the lobbying ban that applies to him. Given Baringa Partners' broad relationship across the UK Government, there is a risk that Mr Lincoln's appointment could be perceived as a means to expand the company's influence. To mitigate this, the Commission agrees with the MOD's recommendation of an explicit ban on all engagement with government on behalf of Baringa Partners for the period he remains subject to the Rules.
17. *Waiting period.* As an SCS4 official, Mr Lincoln is subject to a three month waiting period before taking up any appointments. This has now passed.