



**OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS**

G/7 Ground Floor, 1 Horse Guards Road SW1A 2HQ

Telephone: 020 7271 0839

Email: [acoba@acoba.gov.uk](mailto:acoba@acoba.gov.uk)

Website: <http://www.gov.uk/acoba>

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**BUSINESS APPOINTMENT APPLICATION: Lieutenant General Stuart Richard Skeates, CB, CBE, former Director General, Illegal Migration Operations Command and Senior Responsible Officer for the UK/Albania Migration Agreement, Migration and Borders Group at the Home Office. Application to establish a consultancy operating as Barchester Skeates Associates Limited.**

1. Lieutenant General Stuart Skeates (Lt Gen Skeates) sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for Former Crown Servants (the Rules) to establish a consultancy operating as Barchester Skeates Associates Limited.
2. The purpose of the Rules is to protect the integrity of the government. Under the Rules, the Committee's remit is to consider the risks associated with the actions and decisions made during Lt Gen Skeates' time in government service, alongside the information and influence a former Crown servant may offer his potential clients. The material information taken into consideration by the Committee is set out in the annex.
3. The Committee's advice is not an endorsement of the appointment – it imposes a number of conditions to mitigate the potential risks to the government associated with the appointment under the Rules.
4. The Rules<sup>1</sup> set out that Crown servants must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former Crown servants are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

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<sup>1</sup> Which apply by virtue of the Civil Service Management Code, The Code of Conduct for Special Advisers, The King's Regulations and the Diplomatic Service Code.

### The Committee's consideration

5. In his application, Lt Gen Skeates stated his consultancy will involve offering generalist advisory work in the defence and security sector including strategy and organisational change, public speaking and leadership. He stated he will also seek board advisory work and NED roles.
6. It would not be improper for Lt Gen Skeates to operate a consultancy which draws on generic skills and experience he gained from his time in government. The risks in this case are hard to quantify given the potentially broad and wide ranging nature of the consultancy; and he had access to a wide range of sensitive information and insight whilst in government service. The Committee<sup>2</sup> considered there is a risk he could offer a potential unfair advantage over competitors – whether in relation to seeking new clients, or in providing them with advice.
7. The Committee recognised there is a limited overlap with the work on matters involving border security and migration that Lt Gen Skeates carried out whilst in government service. It is significant that his former department, the Home Office does not consider him to have been involved in any decisions, nor to possess any specific information or insight that could offer his future clients an unfair advantage. Further, his recent roles in office have not involved defence.
8. As his role in government service involved liaising on international collaboration and cooperation, there is a risk associated with the contacts that Lt Gen Skeates will have gained in the former role, where his time in post may be seen to have offered him access to contacts that could be used to gain business for his consultancy.
9. This advice provides Lt Gen Skeates with the consent to only to set up a consultancy in defence and security as described, which excludes border security and migration, and is subject to a number of conditions. It does not give him consent in relation to any possible future clients. He must seek advice in relation to each client, so that risks can be assessed. Further, it will need to be demonstrated by himself and the Home Office that the work would be appropriate under the Rules.
10. It is significant that Lt Gen Skeates has experience prior to his time at the Home Office in leadership and command on military operations and joint operations with NATO and other allied militaries.

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<sup>2</sup> This application for advice was considered by Andrew Cumpsty; Isabel Doherty; Sarah de Gay; Hedley Finn OBE; Dawid Konotey-Ahulu CBE DL; The Rt Hon Lord Pickles; Michael Prescott and Mike Weir. The Baroness Thornton was unavailable.

## Future Commissions

11. Lt Gen Skeates must seek advice from the Committee for each commission he wishes to accept. Whether the conditions set out below can sufficiently mitigate the risk presented by any future commission he proposes to take up will depend on the specific details of each piece of work. Any failure to seek advice before accepting work would be a breach of the Rules and treated as such – including reporting breaches to government.
12. The risks under the Rules will be most significant where Lt Gen Skeates seeks to provide advice on matters where he made decisions or had access to sensitive information in government service – these applications will need close scrutiny. The Committee will want to carefully consider the suitability of this work, and may advise that a further waiting period is required. Where conditions and a suitable waiting period cannot appropriately mitigate the risks, the Committee may advise the work is unsuitable to take up within the two years the Rules apply. The Committee will consider such risks on a case by case basis.
13. All potential clients must be notified of this advice, and when seeking work/new clients, Lt Gen Skeates must adhere to the conditions below. Under the government's Business Appointment Rules, the Committee advises that this independent Consultancy operating as **Barchester Skeates Associates Limited** should be subject to the conditions set out below:
  - he 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 Crown service;
  - for two years from his last day in Crown service, he should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of those he advises under Barchester Skeates Associates Limited (including parent companies, subsidiaries, partners and clients); nor should he make use, directly or indirectly, of his contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage those he advises under Barchester Skeates Associates Limited (including parent companies, subsidiaries, partners and clients);
  - for two years from his last day in Crown service, he should not provide advice to or on behalf of those he advises under Barchester Skeates Associates Limited (including parent companies, subsidiaries, partners and clients) on the terms of, or with regard to the subject matter of, a bid with, or contract relating directly to the work of the UK government or any of its arm's length bodies;

- for two years from his last day in Crown service, he should not become personally involved in lobbying contacts he developed during his time in office and in other governments and organisations for the purpose of securing business for Barchester Skeates Associates Limited; and
  - for two years from his last day in Crown service, before accepting any commissions for Barchester Skeates Associates Limited and or/before extending or otherwise changing the nature of his commissions, he should seek advice from the Committee. The Committee will decide whether each commission is consistent with the terms of the consultancy and consider any relevant factors under the Business Appointment Rules.
14. The advice and the conditions under the government's Business Appointment Rules relate to an applicant's previous role in government only; they are separate from rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists, the Parliamentary Commissioner for Standards and the Registrar of Lords' Interests<sup>3</sup>. It is an applicant's personal responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.
15. By 'privileged information' we mean official information to which a minister or Crown servant has had access as a consequence of his or her office or employment and which has not been made publicly available. Applicants are also reminded that they may be subject to other duties of confidentiality, whether under the Official Secrets Act, the Ministerial Code/Civil Service Code or otherwise.
16. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant/Minister "should not engage in communication with Government (Ministers, civil servants, including special advisers, and other relevant officials/public office holders) – wherever it takes place – with a view to influencing a Government decision, policy or contract award/grant in relation to their own interests or the interests of the organisation by which they are employed, or to whom they are contracted or with which they hold office."
17. Lt Gen Skeates must inform us as soon as he takes up this work or if it is announced that he will do so. Similarly, he must inform us if he proposes to

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<sup>3</sup> All Peers and Members of Parliament are prevented from paid lobbying under the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on obligations under the Code can be sought from the Parliamentary Commissioners for Standards, in the case of MPs, or the Registrar of Lords' Interests, in the case of peers.

extend or otherwise change his role with the organisation as depending on the circumstances, it might be necessary for him to seek fresh advice.

18. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

## **Annex - Material Information**

### Independent Consultancy

1. Lt Gen Skeates stated his independent consultancy, Barchester Skeates Associates Limited, provides generalist advisory work in the defence and security sector including strategy and organisational change, public speaking and leadership. He stated he will also seek board advisory work and NED roles.
2. Lt Gen Skeates stated it has been over 3 years since he worked in the defence sector. The Committee noted he had leadership experience on military operations and in joint operations with various coalitions with the US Marine Corps and NATO, and previously as Commandant of the Royal Military Academy Sandhurst,<sup>4</sup> and Deputy Commander of JFC Brunssum<sup>5</sup>.

### Departmental assessment

3. The Home Office stated that in his roles as Director General, Illegal Migration Operations Command (where he was also Senior Responsible Officer for the Sovereign Borders Programme; Senior Responsible Officer for the New Detained Accommodation Programme; and Senior Responsible Officer for the UK/Albania Migration Agreement), Lt Gen Skeates was not involved in decisions nor possessed sensitive information that may provide an unfair advantage to Barchester Skeates Associates Limited and/or its future clients.
4. The Home Office did not have concerns with the appointment provided it is subject to the standard conditions that apply to an independent consultancy and a restriction on lobbying contacts gained in external governments and organisations for the purpose of securing business for Barchester Skeates Associates Limited and its future clients.

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<sup>4</sup> <https://www.gov.uk/government/people/stuart-skeates>

<sup>5</sup> The Allied Joint Force Command (JFC) Brunssum is a NATO headquarters that includes the United Kingdom as a framework nation. The JFC Brunssum is responsible for planning, executing, and supporting military operations in its assigned area.