



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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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. Paid commission with Equilibrium Gulf Limited under his independent consultancy - Barchester Skeates Associates Limited.

1. Lieutenant General Stuart Skeates (Lt Gen Skeates) sought advice from the Advisory Committee on Business Appointment (the Committee) under the government's Business Appointment Rules for Former Crown Servants (the Rules) on taking up a commission with Equilibrium Gulf Limited (Equilibrium Gulf) under his independent consultancy, 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 Equilibrium Gulf. 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 Rules¹ 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.

¹ 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 of the risks presented

5. The Committee² considered this commission to be broadly consistent with the description of Lt Gen Skeates' consultancy – providing generalist advisory work in the defence and security sector.
6. Equilibrium Gulf is a UK-based geo-strategic advisory company with a focus on advising governments and major commercial corporations on a range of issues, including the Government of Bahrain. Lt Gen Skeates stated he will provide periodic consultancy support to assist its work with the Government of Bahrain in achieving its national priorities in support of its national security objectives.
7. Lt Gen Skeates' roles in government involved leading on illegal migration and UK border security, including international collaboration and cooperation. There is no direct overlap with this work and the end client, the Government of Bahrain. He was not involved in decisions specifically affecting Equilibrium Gulf, nor did he meet with the company while in government service. Therefore, the Committee considered there is limited risk that this commission can reasonably be perceived as a reward for decisions made in office.
8. By virtue of his roles in government Lt Gen Skeates would have had involvement in, and access to, information on matters relating to national security. The risks are limited as there is no direct overlap with his time in government and the work of Equilibrium Gulf and the Government of Bahrain. Further, the Home Office does not consider Lt Gen Skeates to possess sensitive information that may provide Equilibrium Gulf an unfair advantage; and it has been over six months since he left government service - reducing the currency of any information he may possess.
9. As with any former Crown servant, there are risks associated with Lt Gen Skeates' contacts and influence within government and the potential for Equilibrium Gulf to gain unfair access or influence as a result. It is significant that this commission with Equilibrium Gulf excludes any dealings with the UK government, reducing the perceived risk that he could be seeking to influence the UK government – which all former senior Crown servants are prevented from doing for two years after leaving government service.

The Committee's advice

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

10. There is no direct overlap with Lt Gen Skeates' most recent roles in office and this commission with Equilibrium Gulf working with an overseas government. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that he cannot make use of privileged information or influence gained from his time in government service to the unfair advantage of Equilibrium Gulf under his independent consultancy, Barchester Skeates Associates Limited.
11. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this commission with **Equilibrium Gulf Ltd**, should be subject to the same conditions applied to Lt Gen Skeates' independent consultancy, Barchester Skeates Associates Limited:
- 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 Equilibrium Gulf Ltd (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 Equilibrium Gulf Ltd (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 Equilibrium Gulf Ltd (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 you developed during his time in office and in other governments and organisations for the purpose of securing business for Equilibrium Gulf Ltd; 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.

12. 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' Interests³. 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.
13. 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.
14. The Business Appointment Rules explain that the restriction on lobbying means that the former Crown servant "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."
15. 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 extend or otherwise change his role with the organisation as depending on the circumstances, it might be necessary for him to seek fresh advice.
16. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

³ 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.

Annex – Material Information

The role

1. Lt Gen Skeates stated this is a commission under Barchester Skeates Associates Limited, which provides generalist advisory work in the defence and security sector. He stated he will be advising Equilibrium Gulf by providing periodic consultancy support to assist the Government of Bahrain in achieving its national priorities in support of its national security objectives. Lt Gen Skeates confirmed his role will not involve contact with or lobbying of the UK government.
2. The website for Equilibrium states that it is a company specialising in strategic counsel, process and outcomes. It also says it brings *'...together the experience, authority and collective wisdom of established international leaders, with unrivalled reputations for insight, vision and integrity.'* It advertises having a range of international leaders on hand as associates – to provide strategic counsel including former Prime Ministers and Heads of Government, former Central Bank Governors and Deputy Governors, former Chief Police Officers and former senior ministers etc.
3. Lt Gen Skeates stated Equilibrium Gulf is a UK-based geo-strategic advisory company with an international focus. It has been established to assist governments and major commercial corporations to devise and implement strategies that help ensure success in an 'ever more turbulent world'.

Dealings in office

4. Lt Gen Skeates advised the Committee that he did not meet with, nor was he involved in decisions or had access to sensitive information, specific to Equilibrium Gulf.

Departmental assessment

5. 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 and nor did he possess sensitive information that may provide an unfair advantage to Equilibrium Gulf.
6. The Home Office did not have concerns with the appointment provided it is subject to the standard conditions and a restriction on lobbying contacts

gained in external governments and organisations for the purpose of securing business for Equilibrium Gulf.

7. The Foreign, Commonwealth and Development Office was consulted on this appointment and did not have concerns. It noted the appointment would likely be a positive development, with Lt Gen Skeates providing UK expertise to a shared priority area with the Government of Bahrain.