



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 Aaru under your independent consultancy – Barchester Skeates Associates Limited.

1. You sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointment Rules for former Crown servants (the Rules) on taking up a commission with Aaru under your 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 taken during your time in government service, alongside the information and influence a former Crown servant may offer Aaru. 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. Aaru is a data and technology company based in New York, USA – using Artificial Intelligence (AI) to provide predictive intelligence to clients. As a consultant, your proposed commission with Aaru involves providing strategic advice on development of the company's defence technology proposition. The Committee² therefore considered this commission to be broadly consistent with the description of your consultancy – providing generalist advisory work in the defence and security sector.
6. There is no relationship between Aaru and the Home Office and you made no decisions specific to the company. Therefore, the Committee considered the risk this work could reasonably be perceived as a reward for decisions made in office is low.
7. Your role at the Home Office was focussed on UK border security, national security and international cooperation on this matter – not in defence or technology. The Home Office does not consider you to possess any specific information or insight that could offer Aaru an unfair advantage.
8. As a former senior Crown servant, there is a risk that you might be seen to offer unfair access to, and influence within, government for Aaru. You confirmed the work of Barchester Skeates Associates Limited and its clients, including Aaru, excludes any dealings with the UK government, reducing the risk you could be perceived to be lobbying the UK government – which all former senior Crown servants are prevented from doing for two years after leaving government service.
9. The Committee took into account that it has been over three years since you worked in defence and you have extensive experience from prior to your time at the Home Office in leadership and command on military operations and joint operations with NATO and other allied militaries.

The Committee's advice

10. The Committee determined the risks identified can be appropriately mitigated by the conditions below. These make it clear that you cannot make use of privileged contacts, information or influence gained from your time in government service to the unfair advantage of Aaru under your 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

² This application for advice was considered by Isabel Doverty; Hedley Finn OBE; Sarah de Gay; Dawid Konotey-Ahulu CBE DL; Michael Prescott and The Baroness Thornton.

Aaru, should be subject to the conditions below and as also applied to your independent consultancy, **Barchester Skeates Associates Limited**:

- you should not draw on (disclose or use for the benefit of yourself or the persons or organisations to which this advice refers) any privileged information available to you from your time in Crown service;
- for two years from your last day in Crown service, you should not become personally involved in lobbying the UK government or any of its arm's length bodies on behalf of Aaru (including parent companies, subsidiaries, partners and clients); nor should you make use, directly or indirectly, of your contacts in the government and/or Crown service contacts to influence policy, secure business/funding or otherwise unfairly advantage Aaru (including parent companies, subsidiaries, partners and clients);
- for two years from your last day in Crown service, you should not provide advice to or on behalf of Aaru (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 your last day in Crown service, you should not become personally involved in lobbying contacts you developed during your time in office and in other governments and organisations for the purpose of securing business for Aaru; and
- for two years from your last day in Crown service, before accepting any commissions for Barchester Skeates Associates Limited and or/before extending or otherwise changing the nature of your commissions, you 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.

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.

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. You must inform us as soon as you take up this work or if it is announced that you will do so. Similarly, you must inform us if you propose to extend or otherwise change your role with the organisation as depending on the circumstances, it might be necessary for you 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.

Yours sincerely,
Hamzah Rizvi
Committee Secretariat

Annex – Material Information

The role

1. You stated this is a commission under Barchester Skeates Associates Limited, which provides generalist advisory work in the defence and security sector. You confirmed that work taken up under your consultancy will not involve contact with, or lobbying of, the UK government.
2. Aaru is a start-up data and technology company based in New York, USA, utilising Artificial Intelligence (AI) to provide predictive intelligence to clients. According to information online, the company was co-founded by Cameron Fink, Ned Koh and John Kessler in 2024, and works with political campaigns and businesses⁴. Aaru uses AI systems to simulate human behaviour, offering predictions for consumer behaviour and preferences. You stated you will be

⁴ www.research-live.com/article/news/accenture-invests-in-synthetic-audience-startup-aaru/id/5136643

advising Aaru on the development of its defence technology proposition.

3. You stated it has been over three years since you worked in defence. You have leadership experience from military operations and in joint operations with various coalitions - the US Marine Corps and NATO. You also previously held the role of Commandant of the Royal Military Academy Sandhurst⁵ and Deputy Commander of JFC Brunssum⁶.

Dealings in office

4. You advised the Committee that you did not meet with, nor were you involved in decisions specific to Aaru, nor had access to sensitive information that could provide an unfair advantage to the company.

Departmental assessment

5. The Home Office stated that in your role as Director General, Illegal Migration Operations Command (where you were 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), you were not involved in decisions nor did you possess sensitive information that may provide an unfair advantage to Aaru.
6. The Home Office did not have concerns with the appointment provided it is subject to:
 - a. the standard conditions;
 - b. a restriction on lobbying contacts gained in external governments and organisations for the purpose of securing business for Aaru; and
 - c. a limitation that the Committee determined was not needed for this appointment.

⁵ <https://www.gov.uk/government/people/stuart-skeates>

⁶ 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.