



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 Fujitsu Services Ltd 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 Fujitsu Services Ltd (Fujitsu) 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 Fujitsu. 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. Fujitsu is a Japanese-based, multinational information and communications technology (ICT), equipment and services company. Fujitsu has several contracts across the UK government providing IT systems and services, including your former department. The Home Office holds contracts with Fujitsu for an estimated annual value of £55.43 million, involving its management of systems for the Police National Computer, the Enterprise Hosting hardware, the IT Service Desk and ServiceNow software.
6. Whilst Fujitsu has contracts with the Home Office, these sat outside of your recent responsibilities as Director General and Senior Responsible Officer across teams. You were neither involved in, nor had any oversight of any policy, regulatory or commercial decisions specific to the company. The Committee² therefore considered the risk this role could reasonably be perceived as a reward for decisions made in office is low
7. Your proposed commission with Fujitsu as a consultant involves providing strategic advice to a range of teams on borders and security-related projects. The Committee therefore considered this commission to be broadly consistent with the description of your consultancy – providing generalist advisory work in the defence and security sector.
8. There is a clear overlap between your recent role and this proposed work with Fujitsu. Your role at the Home Office was focussed on UK border security, national security and international cooperation – and you seek to advise on borders and security related projects. The Home Office did not consider you to possess any specific information or insight that could offer Fujitsu an unfair advantage. It is also relevant that it has been over 12 months since you left government service, placing a gap between your access to information and taking up this role. During this time, there have been significant announcements in respect of policy, legislation and general direction on government's priorities on border and security related matters – such as the Border Security, Asylum and Immigration Bill^{3 4}.
9. Fujitsu provides advisory services to a range of clients, alongside its IT services. As the clients you will work with are unknown, there is a risk that your role with Fujitsu may involve advising a company with an interest in work that overlaps with your most recent role in government service.
10. Fujitsu has contracts with various UK government departments and arm's length bodies. Given the recent Post Office Horizon IT Inquiry involving Fujitsu,

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.

³ bills.parliament.uk/bills/3929

⁴ As of August 2025, this Bill is currently before the House of Lords at the Committee stage.

there is a risk that any former senior official could be seen to offer the company unfair access to, and influence within, the government. This would be contrary to the lobbying ban which applies to all former senior civil servants for two years on leaving office. The Committee considered it significant that you confirmed you will have no dealings with the UK government in this work. Fujitsu has provided written confirmation the role will be compliant with the Committee's advice and the conditions below.

The Committee's advice

11. 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 Fujitsu under your independent consultancy, Barchester Skeates Associates Limited.
12. The Committee recognises that whilst Fujitsu's operation is not directly related to your responsibilities in government service, the company has a substantial presence with your former department and with other parts of government. Given the company's proximity to the government and your former department, there is a risk that your proposed work could be seen to have some overlap with your time in office and that you may offer unfair access. To mitigate this risk, whilst limited, the Committee has imposed an additional restriction – preventing you from advising on work specifically overlapping with your recent role in government service.
13. It is significant that Fujitsu confirmed its adherence with the Committee's advice and in particular that you would not be involved in any lobbying of the UK government, nor involvement in any government bids and contracts, which would fall to others within Fujitsu.
14. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this commission with **Fujitsu Services Ltd** should be subject to the same conditions which apply to your independent consultancy, **Barchester Skeates Associates Limited**, and the additional sections as set out below:
 - 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 Fujitsu Services Ltd (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 Fujitsu Services Ltd (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 Fujitsu Services 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 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;
- 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 government service in other governments and organisations for the purpose of securing business for Fujitsu Services Ltd; and

In addition, the Committee considered this commission with **Fujitsu Services Ltd** be subject to the additional condition:

- for two years from your last day in Crown service, you should not advise Fujitsu Services Ltd (including parent companies, subsidiaries, partners and clients) regarding any policy or operational matter you had specific involvement in or responsibility for as Director General, Illegal Migrations 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), nor where you had a relationship with the relevant client in Crown service.

15. 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' Interests⁵. It is an applicant's personal

⁵ 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.

responsibility to understand any other rules and regulations they may be subject to in parallel with this Committee's advice.

16. 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.
17. 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.'
18. 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.
19. 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 work

1. You stated this is a commission under Barchester Skeates Associates Limited, which provides generalist advisory work in the defence and security sector. You stated your role as consultant involves providing strategic advice to a range of teams on borders and security-related projects for Fujitsu. You confirmed that work taken up under your consultancy will not involve contact with, or lobbying of, the UK government.
2. Fujitsu is a Japanese multinational ICT equipment and services company and global leader in digital transformation solutions, technology services/products with a strong public and private sector presence.
3. Fujitsu's history with the UK government includes significant collaborations. The company has provided IT systems and services to various government departments, including the Home Office, His Majesty's Revenue and Customs and the Department for Work and Pensions, and the company has been awarded almost £7 billion in government contracts since 2012. The most recent contract from His Majesty's Revenue & Customs awarded Fujitsu a £220.3 million deal for data centre and project services, without competition, in June 2025.
4. The Post Office Horizon IT Inquiry is an independent public statutory inquiry, which was established to gather a clear account of the implementation and failings of the Horizon IT system – provided by Fujitsu – at the Post Office over its lifetime ⁶.

Correspondence with Fujitsu

5. Fujitsu confirmed in writing that it will adhere to the conditions contained in the advice and will incorporate them in any contract it enters into with you in relation to this matter.

Dealings in office

6. You advised the Committee that you:
 - did not meet with Fujitsu;
 - were not involved in decisions specific to the company; and
 - did not have access to sensitive information that could provide an unfair advantage.

Departmental assessment

⁶ www.postofficehorizoninquiry.org.uk

7. The Home Office stated it holds contracts with Fujitsu for an estimated annual value of £55.43 million, involving its management of systems for the Police National Computer, the Enterprise Hosting hardware, the IT Service Desk and ServiceNow software. The Home Office stated that its IT service desk contract with Fujitsu is being brought in-house to save costs (circa £1m) and to align with the other service desk capability already delivered in-house. The contract, worth £21 million, was initially set to expire in January 2026 but will now end in October 2025.
8. The Home Office confirmed that whilst Fujitsu has contracts with the Home Office, these sat outside of your recent responsibilities as Director General and Senior Responsible Officer across teams.
9. The Home Office stated that in your role as Director General, Illegal Migration Operations Command 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. As noted above, your responsibilities did not include decisions specific to Fujitsu and the Home Office did not consider you had access to sensitive information that would provide an unfair advantage to Fujitsu.
10. During the 12 months since you left government, there have been significant announcements in respect of policy, legislation and general direction on government's priorities on border and security related matters – such as the Border Security, Asylum and Immigration Bill⁷.
11. 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 Fujitsu; and a limitation on your role to prevent you from working on matters or with clients that you had direct involvement with in office.

⁷ bills.parliament.uk/bills/3929 – as of August 2025, this Bill is currently before the House of Lords at committee stage.