



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

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

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Business Appointment Application: Baron Petitgas, of Bosham (Franck Robert Petitgas), former Special Adviser to the Prime Minister on Business and Investment. Paid appointment with Quantexa.

1. Lord Petitgas, former Special Adviser to the Prime Minister on Business and Investment, 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 a paid appointment he wishes to take up with Quantexa as a Consultant.
2. The purpose of the Rules is to protect the integrity of the government. The Committee has considered the risks associated with the actions and decisions made during Lord Petitgas's time in office, alongside the information and influence he may offer Quantexa. 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 set out that Crown servants must abide by the Committee's advice.¹ 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. Quantexa is a global AI, data and analytics software company creating decision intelligence solutions for organisations. It operates across banking, insurance and the public sector. Lord Petitgas's role as a Consultant for Quantexa would involve providing CEO support for the company's direction, attending its strategy offsite once a year and advising on interactions with private sector clients
6. Lord Petitgas had official dealings with Quantexa while in office, inviting them to attend events alongside other private sector companies for discussions in AI. He said this was to ensure input on AI and to generally promote the UK as a centre of innovation and Quantexa was an important stakeholder as a leader in the field (particularly its work with large financial institutions).
7. Notably, Quantexa also has a contractual relationship with the government, holding a framework agreement with Crown Commercial Services offering software for big data and analytics. Lord Petitgas' former department, the Cabinet Office, also holds a contract with Quantexa, which began in 2025. As the Prime Minister's Adviser, he was more than likely involved in considering policy discussions and decisions aimed at promoting business and investment into the UK. However, the Cabinet Office confirmed that Lord Petitgas was not involved in any policy, operational or commercial decisions specific to Quantexa while in office. Therefore, Committee² considered the risks this appointment could reasonably be perceived as a reward for decisions taken in office are limited.
8. Given Lord Petitgas' former role at No. 10, he would have had access to general sensitive information, including that which relates to businesses such as Quantexa. The risk associated with his access to information is limited because:
 - it has been a year since Lord Petitgas left office and there has been a change of government since Lord Petitgas left his role at No.10. This has included a change in policy direction, including fiscal decisions that significantly affect business in the UK. This provides a gap between his access to information and him taking up this appointment, and limits its usefulness.
 - the Cabinet Office noted his general access to information on business and investment, but did not consider Lord Petitgas to possess any particularly sensitive information that may confer an unfair advantage to Quantexa.

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

9. There is a risk that Lord Petitgas's influence and contacts within government could be perceived to benefit Quantexa unfairly. Quantexa is already an agreed government supplier including via the Crown Commercial Services Framework. Despite the change in government, his contacts and influence gained whilst at No.10 could be seen to offer access and /or influence to an organisation with a clear interest in government policy and contracts. Therefore, there is a risk should he have any contact with government in this role. Lord Petitgas has stated this will not be part of his role and that he has no desire to lobby government.
10. It was also relevant to the Committee's consideration that Lord Petitgas entered government following an extensive career in financial services. He sees this as building on his expertise

The Committee's advice

11. The Committee considered the risks associated with Lord Petitgas's access to information to be limited for the reasons set out above. The standard conditions below prevent him from making improper use of privileged information, contacts and influence gained in office, alongside his ongoing duty of confidentiality.
12. Whilst it is not his intention, the Committee has also imposed a condition which prevents Lord Petitgas from initiating any engagement with the UK government on behalf of his new employer. That is to prevent any reasonable concern that Quantexa is granted unfair access or influence within government as a result of his role.
13. The Committee's advice, under the government's Business Appointment Rules, that this role with **Quantexa** should be subject to the following conditions:
- 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 its arm's length bodies on behalf of *Quantexa* (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 *Quantexa* (including parent companies, subsidiaries, partners and clients); and

- for two years from his last day in Crown service, he should not provide advice to *Quantexa* (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 its arm's length bodies.
 - for two years from his last day in office, you should not have any engagement on behalf of *Quantexa*, (including parent companies, subsidiaries, partners and clients) with the UK government.
14. The advice and the conditions under the government's Business Appointment Rules relate to his 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.³ Lord Petitgas is reminded that as a Member of the House of Lords he is prevented from any paid lobbying under the House of Lords Code of Conduct. 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 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. Lord Petitgas must inform us as soon as he takes up employment with Quantexa, or if it is announced that he will do so; he must also inform us if he proposes to extend or otherwise change the nature of his role as, depending on the circumstances, it may be necessary for him to make a fresh application.

³ All Peers and Members of Parliament are prevented from paid lobbying under the the House of Commons Code of Conduct and the Code of Conduct for Members of the House of Lords. Advice on your 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.

18. Once the appointment has been publicly announced or taken up, we will publish this letter on the Committee's website, and where appropriate, refer to it in the relevant annual report.

Yours sincerely,

Madeleine Crowther
Committee Secretariat

Annex - Material information

The role

1. Quantexa's website states that it pioneered network analytics, and uses data and analytics technology to help organisations identify and connect the relationships which matter most to enable better operational decisions. Quantexa's website states that it works across banking, insurance and the public sector. Quantexa's website says that its government work has included work for tax authorities, healthcare, customs agencies, border control and fraud, waste and abuse investigation.
2. Lord Petitgas said that he will be a Consultant for Quantexa, supporting on providing CEO support for the company's direction, attending the yearly strategy offsite and advising on interactions with private sector clients. He said he was aware of Quantexa's contractual relationship with government and he would have:
 - a. no contact with government;
 - b. no involvement in the commercial relationship; and
 - c. no role, or interest, in lobbying the government.

Dealings in office

3. Lord Petitgas advised the Committee that he met with Quantexa while in office, having known about the organisation as an industry leader. He said he invited them to attend events, which included the AI Opportunity forum which involved 20 private sector leading companies in the UK. Lord Petitgas noted HSBC was a core shareholder of Quantexa from inception, which he said designated the company as an important player to cultivate in the sector.
4. He said that Quantexa was one of many leading businesses he brought into the No.10 business unit's database and focus.
5. Lord Petitgas said he was not involved in: any commercial or contractual decisions relating to Quantexa or any relevant policy development or decisions that would have affected Quantexa. Neither did he consider he had any access to sensitive information of relevance.
6. Lord Petitgas noted the relationships between various government departments and Quantexa, but was not personally aware of contracts involved. He said he would not be involved in the future with such contracts.

Department Assessment

7. The Cabinet Office confirmed the information Lord Petitgas provided above.
8. For context, the Cabinet Office confirmed the following contracts with Quantexa across government:
- **Cabinet Office**
Provision of a Data Management and Counter Fraud Detection Software and Support, Contract start date: 3 March 2025, Contract end date: 2 March 2030, Value of contract: £5,000,000
Network Analytics and Entity Resolution, Contract start date: 28 July 2021, Contract end date, 27 July 2022, Value of contract: £362,280
 - **HMRC**
UCR Entity Resolution, Contract start date: 19 September 2024, Contract end date: 18 September 2026, Value of contract: £1,998,161
 - **BEIS**
DDaT23211, Contract start date, 12 June 2023, Contract end date: 11 June 2024, Value of contract: £229,200 to £458,400
 - **Crown Commercial Service**
Provision of a Single Network Analytics Platform, Contract start date: 18 January 2023, Contract end date: 2 January 2026, Value of contract: £3,462,000
Fraud Network Analytics and Entity Resolution (Covid-19 Loan Schemes), Contract start date: 31 March 2022, Contract end date: 31 March 2023, Value of contract: £540,000
9. The department said that while Quantexa held these contracts with UK government departments, it was unlikely Lord Petitgas had any knowledge or influence - and that he was not involved in commercial contracts.
10. The department said that given Lord Petitgas's role was to advise the Prime Minister in his role as Special Adviser on Business and Investment, it is likely that he was exposed to some privileged information about the previous government's legislative and policy programme in this area. The Cabinet Office noted the rapidly changing nature of the AI development sector, and the time since Lord Petitgas was in government (now 12 months). The department said it was unlikely therefore he would hold privileged information that could confer a significant competitive advantage to Quantexa.
11. The Cabinet Office recommended standard conditions.