

Ministry of Defence

25 November 2025

Paid appointment with Quantexa Limited: Application under the Business Appointment Rules from Mr Paul Lincoln, former Second Permanent Secretary at the Ministry of Defence.

Thank you for submitting an application for advice under the Business Appointment Rules¹ (the Rules) to the Civil Service Commission (the Commission) on behalf of **Mr Paul Lincoln**, formerly Second Permanent Secretary at the Ministry of Defence (MOD). The application is for a paid role as a Strategic Advisor with **Quantexa Limited (Quantexa)**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Mr Lincoln is a former civil servant at SCS Pay Band 4. His last day of service was 9 May 2025.

The purpose of the Rules is to protect the integrity of the government. They aim to avoid any reasonable concerns that: a civil servant may be influenced in their official duties by the risk of reward; a civil servant may improperly exploit access to information; and an organisation may gain an improper influence through the employment of a civil servant.

The Commission's advice is that the appointment should be made subject to the following conditions:

1. Mr Lincoln should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information² available to him from his time in the civil service.
2. For two years from his last day in office, until 9 May 2027, Mr Lincoln should not become personally involved in lobbying³ the UK Government or its arm's length bodies on behalf of Quantexa (including parent companies, subsidiaries, partners and clients). He should also not use, directly or indirectly, his contacts in the government and/or civil service to influence policy, secure business/funding or otherwise unfairly advantage Quantexa

¹ See the [Business appointment rules for Crown servants](#).

² Meaning official information to which a civil servant has had access as a consequence of his or her office or employment and which has not been made publicly available.

³ As defined in the rules.

(including parent companies, subsidiaries, partners and clients).

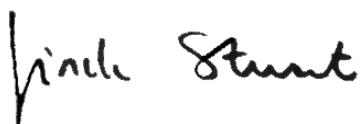
3. For two years from his last day in the civil service, until 9 May 2027, Mr Lincoln should not provide advice to Quantexa, on the terms of, or with regard to the subject matter of, a bid or contract with, or relating directly to the work of, the UK government or its arm's length bodies.
4. For two years from his last day in the civil service, until 9 May 2027, Mr Lincoln should not have any engagement on behalf of Quantexa (including parent companies, subsidiaries, partners and clients) with the UK government or any of its arm's length bodies.

Mr Lincoln and Quantexa confirmed to the Commission of his intention to fully comply with the lobbying ban that applied to him. Quantexa also confirmed its understanding of, and adherence to the remaining conditions that apply to Mr Lincoln's role.

The Rules set out that civil servants must abide by the Commission's advice. It is Mr Lincoln's personal responsibility to manage the propriety of any appointment and to understand any other rules and regulations they may be subject to in parallel with the Commission's advice.

Mr Lincoln must seek advice if he proposes to extend or otherwise change his role with the organisation. Once this appointment has been publicly announced or taken up, the letter will be published on the Civil Service Commission's website.

Yours sincerely,

A handwritten signature in black ink that reads "Gisela Stuart". The signature is fluid and cursive, with "Gisela" on the first line and "Stuart" on the second line.

Gisela Stuart
First Civil Service Commissioner

Annex A: The application

Applicant assessment

1. According to its website, Quantexa is a network analytics company which operates with organisations across banking, insurance, and the public sector. Areas covered by Quantexa's work with the UK government includes tax authorities, healthcare, customs agencies, border control, and investigations into fraud, waste, and abuse.
2. Quantexa has a range of contracts across government departments with Cabinet Office, HMRC, DESNZ and Crown Commercial Service, though not with the MOD.
3. As Strategic Advisor, Mr Lincoln's role will include:
 - supporting strategy development;
 - helping to translate strategic vision into actionable initiatives;
 - testing business priorities, risks and opportunities;
 - acting as an independent sounding board;
 - supporting the advisory board and members on individual projects; and
 - facilitating strategic workshops and planning sessions with senior leaders.
4. Mr Lincoln said his role will not involve contact with, or lobbying of, the government.
5. Mr Lincoln stated he had a broad relationship with the defence and security industry. He said his work was broadly strategic and impacted whole sectors rather than focus on individual companies. He stated he did not meet with Quantexa, nor did he have involvement in policy development or decisions specific to the company. He added that he was not privy to sensitive information that could provide Quantexa with an unfair advantage.

Correspondence with Quantexa

6. Quantexa confirmed its understanding of, and adherence to the Commission's advice and the conditions imposed on Mr Lincoln's appointment. The company confirmed his role will not constitute lobbying.

Departmental assessment

7. The MOD stated that as Second Permanent Secretary, Mr Lincoln held specific responsibility for a number of areas which interact with Quantexa's product offering, including digital transformation and cyber security. However, other officials in the department had specific responsibility for the relevant programmes and procurement. Mr Lincoln interacted with companies to discuss strategic requirements of the department, not the detail of specific programmes or contracts. The MOD added that he did not meet with Quantexa, nor was he involved in decisions specific to the company.
8. The MOD did not consider Mr Lincoln to possess sensitive information that presents an unfair advantage to Quantexa.
9. The MOD stated that Mr Lincoln has influence and connections at the highest level of the department and its major suppliers. It stated that there is a potential for Quantexa to seek to market their platform to the department and Home Office given they already hold contracts with the Cabinet Office for Fraud Detection, and mention border security among the applications of their product, as well market it in UK government supply chains.
10. The MOD also recommended the standard conditions as well as a restriction on Mr Lincoln initiating engagement with the UK government on behalf of Quantexa to address the influencing risk.

CSC analysis

11. *Risk of reward.* As Second Permanent Secretary, Mr Lincoln was broadly involved in strategic decisions that impacted the MOD. The department confirmed that he was not involved in decisions specific to Quantexa, nor in decisions specifically impacting its competitors. The Commission agreed with the department's view that the risk that he was offered this role as a reward for decisions or actions taken in office was low.
12. *Access to information.* It is likely that as Second Permanent Secretary, Mr Lincoln had access to a wide range of information that may benefit Quantexa. This risk is limited as the MOD does not consider Mr Lincoln to possess sensitive information that may provide an unfair advantage, and in the time passed since leaving government service over six months ago, much of the information he was privy to on Defence Strategy, such as the [Strategic Defence Review](#) and [Defence Industrial Strategy](#), is published and in the public domain. Further, the risk relating to his access to information not specific to the work of Quantexa.
13. *Improper influence.* There are risks associated with a former senior civil servant joining an organisation that has existing commercial relationships

across government and may seek to further expand its influence. Mr Lincoln stated that his role will not involve contact with, or lobbying of, government. Mr Lincoln and Quantexa confirmed to the Commission of his intention to fully comply with the lobbying ban that applies to him. The standard lobbying ban will go some way to mitigate this. Given Quantexa's significant commercial relationships with government departments and Mr Lincoln's former role, the Commission therefore agrees with the MOD's recommendation that an explicit ban on initiating engagement on behalf of Quantexa will further credibly mitigate the influencing risk.