



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS
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BUSINESS APPOINTMENTS APPLICATION FOR ADVICE: Baroness Simone Finn, former Deputy Chief of Staff at No.10. Paid appointment with Project Tempo Ltd.

1. Baroness Finn sought advice from the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for Former Crown Servants (the Rules) on an appointment she wishes to take up with Project Tempo Ltd as Chair of the Board.
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 Baroness Finn's time in office, alongside the information and influence a former Special Adviser at No.10 may offer Project Tempo. 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.

The Committee's consideration

5. Baroness Finn did not meet with Project Tempo whilst in post and did not make any decisions regarding Project Tempo or its competitors while in post. The

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.

Committee² considered the risk low that she was offered this role as a reward for decisions or actions taken in office is low.

6. As the former Deputy Chief of Staff at No.10, due to the breadth of her work, Baroness Finn would have gained general insight and access to sensitive information that could benefit a wide range of organisations. The Committee considered the factors below that mitigate the risks associated with access to information:

- a. this is a general risk, Cabinet Office confirmed that as Deputy Chief of Staff at No.10 she had no specific responsibilities for or involvement in green policy. This significantly reduces the risk Baroness Finn will be working on any matters that overlap with her time in government; and
- b. the Cabinet Office said the change in administration, alongside the 12 months that have passed since she left office means the currency of any such information is likely to be degraded.

7. There are risks associated with Baroness Finn's potential influence within government, gained as a result of her time at No. 10. This is especially relevant as the organisation looks to act as a knowledge partner to organisations including governments. The Committee noted Baroness Finn's role does not involve contact with government in this role, limiting the risks associated.

The Committee's advice

8. The Committee determined the risks above can be appropriately mitigated by the conditions that apply below, alongside the 16 months that have passed since Baroness Finn was in government. These make it clear she cannot make use of any privileged access to information, contacts or influence gained from her time in government service to the unfair advantage of Project Tempo.

9. The Committee's advice in accordance with the government's Business Appointment Rules is that this role with **Project Tempo Ltd** be subject to the below conditions:

- she should not draw on (disclose or use for the benefit of herself or the persons or organisations to which this advice refers) any privileged information available to her from her time in Crown service;
- for two years from her last day in Crown service, she should not become personally involved in lobbying the UK government or any of its Arm's Length Bodies on behalf of Project Tempo Ltd (including parent companies, subsidiaries, partners and clients); nor should she make use, directly or indirectly, of her contacts in the government and/or ministerial contacts to influence policy, secure business/funding or otherwise unfairly advantage Project Tempo Ltd (including parent companies, subsidiaries, partners and clients); and

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

- for two years from her last day in Crown service she should not provide advice to Project Tempo Ltd 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 any of its Arm's Length Bodies.

10. The advice and the conditions under the government's Business Appointment Rules relate to Baroness Finn'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.

11. 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.

12. 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.*"

13. Baroness Finn must inform us as soon as she takes up this work or if it is announced that she will do so. Similarly, she must inform us if she proposes to extend or otherwise change her role with the organisation as depending on the circumstances, it might be necessary for her to seek fresh advice.

14. Once this appointment has been publicly announced or taken up, we will publish this letter on the Committee's website.

Isabella Wynn
Committee Secretariat

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 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

Annex - Material information

The role

1. Baroness Finn said Project Tempo is a non-profit organisation that aims to deliver positive change by ‘...unlocking the fastest pathway to prosperous and productive economies’. It stated it does this by providing public opinion, economic and environmental research. She said Project Tempo’s current programme of work is in the European Union.
2. Baroness Finn said the objects of Project Tempo are the protection, preservation and improvement of the environment, with the organisational focus being:
 - mitigating against the emerging policy action gap that presents a critical risk to accelerated decarbonisation in European and global economies;
 - acting as a knowledge partner to charities, non-governmental organisations, governments and other stakeholders worldwide who are seeking new and politically salient ideas to drive accelerated decarbonisation;
 - building new capacity to unlock the right conditions for change by:-
 - understanding the drivers of change versus orthodoxy in the political economy via deep voter research;
 - building strategies to unlock new policy pathways in existing and new technology; and disseminating and engaging on the research undertaken and the strategies developed to unlock political pathways and implement decarbonisation solutions;and
 - designing, engaging on and publishing policy with a view
3. Baroness Finn said she wishes to take up a paid, part-time role as Chair of the Board. The Chair will:
 - a. be responsible for leading all board activity and providing the highest level of strategic leadership to Project Tempo. I
 - b. play a crucial role in the organisation’s buildout, drawing on their political, corporate and non-profit expertise to lead these efforts.
 - c. be a strategic guide for the organisation, providing oversight of internal and external operations.
 - d. Responsibilities will include strategy, governance, financial oversight, risk management, engagement and regulatory compliance.She will have no contact with the government in this role.

Dealings in office

4. Baroness Finn stated she neither had any dealings with, nor met with, nor made any decisions specific to Project Tempo while in office. She does not know of any relationship between the organisation and her former department.

Department Assessment

5. The Cabinet Office confirmed the details provided by Baroness Finn and confirmed it had no relationship with the organisation.

6. The department said as Deputy Chief of Staff to the Prime Minister, Baroness Finn was in a very senior position at No. 10 and, as such, had access to a wide range of sensitive information. It confirmed she did not work in green policy and considers there is little overlap with her time in government and Net Zero / decarbonisation sector - she did not work on green policy. As such, the Cabinet Office considered she would not have been exposed to detailed sector knowledge to give her prospective employer any material advantage. Further, the Cabinet Office said given the change in administration since Baroness Finn's departure from government 16 months ago, reducing the currency of any information.

7. The Cabinet Office had no concerns with Baroness Finn taking up this role and recommended the standard conditions.