



HOUSE OF LORDS

Report from the Commissioner for Standards

The conduct of  
Lord Finkelstein, Baroness  
Deech, Baroness Altmann and  
Lord Pickles

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The independent Commissioner for Standards is responsible for considering any alleged breaches of the Codes of Conduct.

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## THE CONDUCT OF LORD FINKELSTEIN, BARONESS DEECH, BARONESS ALTMANN AND LORD PICKLES

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### Summary of complaints

1. Between 21 and 22 October, my office received six complaints from a member of the public, Mr Anthony Posner, regarding the conduct of four members of the House of Lords: Lord Finkelstein, Baroness Deech, Baroness Altmann and Lord Pickles relating to their registration and declaration of interests.<sup>1</sup>
2. The first complaint from Mr Posner, received on 21 October, concerned the conduct of Lord Finkelstein. Mr Posner alleged that Lord Finkelstein had failed to register his role as Vice President of the Jewish Leadership Council (JLC).
3. The other complaints all related to instances in which Lord Finkelstein, Baroness Deech, Baroness Altmann and Lord Pickles had allegedly failed to declare relevant interests in the course of speeches they made in the House of Lords.

### Relevant aspects of the Code

4. Paragraph 12 of the Code of Conduct states:

“In order to assist in openness and accountability members shall:

  - (a) register in the Register of Lords’ Interests all relevant interests, in order to make clear what are the interests that might reasonably be thought to influence their parliamentary actions.
  - (b) declare when speaking in the House, or communicating with ministers or public servants, any interest which is a relevant interest in the context of the debate or the matter under discussion.”
5. I wrote to each of the members with details of the relevant complaints against them and asked for a written response, which they all provided promptly.

### Lord Finkelstein

#### *Registration of interests*

6. Mr Posner alleged that Lord Finkelstein had breached the Code of Conduct by failing to register his role as Vice-President of the JLC.
7. Lord Finkelstein explained the circumstances in which he came to be appointed as a Vice-President of the JLC. He told me that in December 2015, having been in touch with the Chief Executive of the JLC regarding a separate matter, the Chief Executive of the JLC emailed him saying:

“It prompted me to suggest something else. We are refreshing our list of Honorary Vice Presidents and ... the Trustees of the JLC have authorised me to ask if you would do us the honour of accepting an appointment as an Honorary Vice President of the JLC. “

In a further email from November 2019 Chief Executive of the JLC said he thought Lord Finkelstein would be well placed to consult on their strategy

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<sup>1</sup> The investigation and report were completed by Martin Jelley QPM.

because “we believe that you will have a unique insight, having appropriate knowledge of the JLC’s work from an independent and external perspective”.

8. Lord Finkelstein explained that since it was an honorary position, he did not believe it constituted a registrable interest. The Guide to the Code states at paragraph 100, “The following posts should not be registered: ... other honorary posts”.
9. He told me:
 

“I have no executive power in JLC of any kind; I do not have a vote on any body or committee that runs it; I have no financial responsibility or oversight of any kind; and I have never been to the office of the JLC. I once attended a formal meeting of it where some polling was presented and I have on occasion (perhaps twice) fulfilled a speaking engagement at the invitation of the JLC. This emphatically does not make me an office holder or a trustee. I am a patron.”
10. I accept that Lord Finkelstein believed the position to be honorary and did not register it as an interest because he believed it fell under paragraph 100 of the Guide to the Code. However, the JLC’s website has a page about its Vice Presidents which does not make any reference to them being honorary positions.<sup>2</sup> It says that they “advise the JLC’s Trustees and Council of Membership. They have a voice but not a vote – they attend meetings and give their time and experience to the Jewish Community and the JLC. Some Vice Presidents volunteer to join JLC committees.” I note that other members of the Lords have registered their positions as Vice Presidents of the JLC.

### *Finding*

11. **Based on the description of JLC Vice-Presidents from their own website, I consider that it constitutes a registrable interest under category 10(e). I accept that Lord Finkelstein believed it to be an honorary position which did not need to be registered, and that he made the decision not to register it in good faith, with no attempt to conceal his position or mislead anyone.**
12. **I find that Lord Finkelstein inadvertently committed a minor breach of paragraph 12(a) of the Code of Conduct. He has added his position as JLC Vice-President to his Register of Interests and I do not consider there is any need for a sanction.**

### *Declaration of interests*

13. Mr Posner also alleged that Lord Finkelstein was in breach of the Code of Conduct for failing to declare his position as Vice-President of the JLC during a debate on antisemitism on 20 June 2019.
14. Paragraph 104 of the Guide to the Code says:

“The main purpose of declaration of interest is to ensure that fellow members of the House, ministers, officials and the public are made aware, at the point at which the member participates in proceedings of the House or otherwise acts in a parliamentary capacity, of any present

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<sup>2</sup> [https://www.thejlc.org/vice\\_presidents](https://www.thejlc.org/vice_presidents)

or expected future interest that might reasonably be thought relevant to that particular action by the member.”

15. Lord Finkelstein told me:

“no reasonable person could regard my role with the JLC as impacting on my speech against anti-semitism. There is no sense in which I was advancing the interest of any external body. To regard opposing anti-semitism as advancing the interests of the JLC would be to indulge a conspiracy theory that suggests that opposing racism was done to advance an institutional interest.”

### *Finding*

16. **Members may choose to declare non-financial interests in the course of their speeches in the House, but I consider that the Code only requires them to do so if the subject matter is closely connected to the position they hold, or if they talk about the work of that organisation in their speech.**

17. **Lord Finkelstein’s speech on 20 June 2019 made no reference to the JLC, and I agree that no reasonable person would consider that his position at the JLC influenced his actions that day.**

18. **I conclude that Lord Finkelstein is not in breach of paragraph 12(b) of the Code of Conduct. The complaint is therefore dismissed.**

### **Baroness Deech**

#### *Declaration of interests*

19. Mr Posner alleged that Baroness Deech failed to declare her role as a trustee of the Community Security Trust (CST) during a question for short debate on 21 January 2021. The title of the question for short debate was “Baroness Deech to ask Her Majesty’s Government what assessment they have made of the report by the Community Security Trust *Campus Antisemitism in Britain 2018–2020*, published on 17 December, and in particular, the finding that the number of anti-Semitic incidents in universities has increased.”

20. The Assistant Registrar of Lords’ interests informed me that Baroness Deech had registered her role as a Trustee at the CST in April 2010.

21. Baroness Deech explained that the registration of her role as a Trustee at the CST was an inadvertent error on her part.

“I must apologise for mistakenly including on the register of interests that I was a Trustee of the Community Security Trust. I simply do not know how this came about. I have tracked back to my own CV of some years ago that I was a Patron of the CST and somehow this turned into Trustee. Mr Posner’s complaint reminded me that I had had no communication at all from the CST for years, other than as a member of the public.”

22. Baroness Deech told me that she contacted the CST to ask whether she occupied any formal position with them and they responded, “I’ve checked and you aren’t a trustee of CST and we don’t have patrons. I don’t think you have any formal position with us.”

*Finding*

23. **Baroness Deech’s registration as a trustee of the CST was made in error, and I am satisfied by the explanation and evidence provided to me.**
24. **Members who mistakenly register interests which they do not hold are not in breach of any specific provision of the Code.**
25. **Baroness Deech had no role at the CST during the time of her question for short debate. I conclude that Baroness Deech is not in breach of paragraph 12(b) of the Code of Conduct. The complaint is therefore dismissed.**

**Baroness Altmann***Declaration of interests*

26. Mr Posner alleged that Baroness Altmann breached the Code of Conduct when she failed to declare her interest as a Vice-President of the JLC during a debate on antisemitism on 20 June 2019.
27. Like Lord Finkelstein, Baroness Altmann did not think that this was something that should need to be declared during a debate on antisemitism.

*Finding*

28. **Baroness Altmann’s speech on 20 June 2019 made no reference to the JLC, and I agree that no reasonable person would consider that her position at the JLC influenced her actions that day.**
29. **I conclude that Baroness Altmann is not in breach of paragraph 12(b) of the Code of Conduct. The complaint is therefore dismissed.**

**Lord Pickles***Declaration of interests*

30. Mr Posner alleged that Lord Pickles breached the Code of Conduct on two occasions where he failed to declare his position on the advisory board of the CST: on 22 July 2019 during proceedings of the Parliamentary Buildings (Restoration and Renewal) Bill, and on 21 January 2021 during a question for short debate on antisemitism on university campuses. The title of the question for short debate was “Baroness Deech to ask Her Majesty’s Government what assessment they have made of the report by the Community Security Trust *Campus Antisemitism in Britain 2018–2020*, published on 17 December, and in particular, the finding that the number of anti-Semitic incidents in universities has increased.”
31. Lord Pickles told me that he was not made a member of the advisory board of the CST until January 2020 so there was nothing for him to declare regarding the CST in July 2019.
32. Regarding the January 2021 debate, Lord Pickles explained that he was making:

“a narrow point on the International Holocaust Remembrance Alliance (IHRA) definition of Antisemitism. I made no reference to Baroness Deech’s question. In making that narrow and confined point I mentioned

the most relevant interest, namely that I was Head of the UK delegation to IHRA ... Given the Lord Speaker's instructions for short questions during the period of the Hybrid House, and the one minute speaking limit, I believe I disclosed more to the Grand Committee by specifically referencing my most relevant interest than the oblique "I draw attention to my entry in the Registry of Interest".

### *Finding*

33. **Lord Pickles held no position at the CST in 2019 so had nothing to declare in respect of them during his speech on 22 July 2019.**
34. **One minute speaking limits are the shortest limits imposed in the House of Lords. In these circumstances, I consider it appropriate for members to declare only the interests that are directly relevant to the content of their speech. A one-minute speaking limit was in force on 21 January and I consider that Lord Pickles declared the most directly relevant interest in the course of his speech.**
35. **I conclude that Lord Pickles is not in breach of paragraph 12(b) of the Code of Conduct. The complaint is therefore dismissed.**

### *Conclusion*

36. **With the exception of Lord Finkelstein's failure to register his Vice Presidency of the JLC, a minor breach which I considered to be entirely inadvertent, all of the rest of the complaints in this report have been dismissed.**