



OFFICE OF THE ADVISORY COMMITTEE ON BUSINESS APPOINTMENTS

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BUSINESS APPOINTMENT APPLICATION: Damian Collins MP, former Parliamentary Under Secretary of State for Tech and the Digital Economy at the Department for Digital, Culture, Media & Sport. Unpaid appointment with Center for Countering Digital Hate.

1. You approached the Advisory Committee on Business Appointments (the Committee) under the government's Business Appointments Rules for former ministers (the Rules) seeking advice on taking up an appointment as a member of the advisory board of the Center for Countering Digital Hate (CCDH). The material information taken into consideration by the Committee is set out in the annex below.
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 made during time in office, alongside the information and influence a former minister may offer CCDH.
3. The Ministerial Code sets out that ministers must abide by the Committee's advice. It is an applicant's personal responsibility to manage the propriety of any appointment. Former ministers of the Crown, and Members of Parliament, are expected to uphold the highest standards of propriety and act in accordance with the 7 Principles of Public Life.

The Committee's advice

4. When considering this application, the Committee¹ took into account this role as a member of the advisory board of CCDH is unpaid². Generally, the Committee's experience is that the risks related to unpaid roles are limited. The purpose of the Rules is to protect the integrity of the government by considering the real and perceived risks associated with former ministers using privileged access to contacts and information to the benefit of themselves or those they represent; and to mitigate the risks that individuals may make decisions or take action in office to in expectation of rewards, on leaving government. These risks are significantly limited in unpaid cases due to the lack of financial gain to the individual.

5. As above the Committee recognised that the risks in this unpaid appointment are limited. There is an overlap with your most recent time in office and your proposed role with CCDH. While DCMS has a relationship with CCDH it confirmed you made no decisions specifically affecting the organisations and confirmed it had no concerns with you taking up this appointment.

6. It is significant that you are returning to the same role you held with CCDH prior to joining government for just over three months in July 2022. The Committee did not consider this appointment raises any particular proprietary concerns under the government's Business Appointment Rules. While there are inherent risks associated with your access to sensitive information and contacts, the standard conditions below will sufficiently mitigate this case.

7. Taking into account these factors, in accordance with the government's Business Appointment Rules, the Committee advises this appointment with the **Center for Countering Digital Hate** be subject to the following conditions:

- 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 ministerial office;
- for two years from your last day in ministerial office, you should not become personally involved in lobbying the UK government or its arms' length bodies on behalf of Center for Countering Digital Hate (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 to influence policy, secure business/funding or otherwise unfairly advantage Center for Countering Digital Hate (including parent companies, subsidiaries, partners and clients); and

¹ This application for advice was considered by Jonathan Baume; Andrew Cumpsty; Isabel Doverty; Sarah de Gay; The Rt Hon Lord Pickles; Richard Thomas; Mike Weir and Lord Larry Whitty. Dr Susan Liautaud was unavailable.

² By unpaid the Committee means that no remuneration of any kind is received for the role. Applicants must declare where it is agreed or anticipated they may receive remuneration or some other compensation at some stage in the future.

- for two years from your last day in ministerial office you should not undertake any work with Center for Countering Digital Hate (including parent companies, subsidiaries, partners and clients) that involves providing advice 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 arms' length bodies.

8. The advice and the conditions under the government's Business Appointment Rules relate to your previous roles in government only; they are separate to rules administered by other bodies such as the Office of the Registrar of Consultant Lobbyists or the Parliamentary Commissioner for Standards. 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.

9. 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.

10. 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.*" This Rule is separate and not a replacement for the Rules in the House.

11. I should be grateful if you would inform us as soon as you take up this role, or if it is announced that you will do so. You must also inform us if you propose to extend or otherwise change the nature of your role as, depending on the circumstances, it may be necessary for you to make a fresh application.

12. 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.

Isabella Wynn
Committee Secretariat

Annex - Material information

The role

1. You said CCDH is a British non-profit organisation with offices in London and Washington, DC. It campaigns for big tech firms to stop providing services to

individuals who may promote hate and misinformation. The website states its work is carried out by two organisations, which operate collaboratively in carrying out their shared mission. CCDH states its work encompasses '*...research, campaigns and policy to increase the economic, reputational and political costs of all parts of the infrastructure – the actors, systems and culture – that support and often profit from hate and disinformation*'. The website stated CCDH works with '*...academics and practitioners in diverse fields, such as political science, behavioural psychology, neurology, the law, countering violent extremism (CVE), counterterrorism and child protection to develop strategies that strengthen tolerance and democracy, and counterstrategies to new forms of hate and disinformation*'.

2. You said you will take up an unpaid, part-time role as an advisory board member. You said as a member of the advisory board for CCDH you will give advice to the organisation based on the issues they campaign on. You said your role would not involve contact with government and would not involve any advocacy on behalf of that organisation.

3. You are returning to the same role you held with CCDH before rejoining the government in July 2022 for just over three months.

Dealings in office

4. You confirmed you had one meeting with CCDH during your time as a minister as part of a wider stakeholder engagement on the Online Safety Bill. You said they were already consulted by officials at the department on this legislation before you became a minister. You confirmed this meeting was routine.

5. You also informed the Committee you did meet with a wide variety of stakeholders on the Online Safety Bill but said you do not have access to sensitive information relevant to CCDH.

Department Assessment

6. The department confirmed the CCDH are a civil society stakeholder and the organisation regularly contacts DCMS with views on the Online Safety Bill. DCMS stated it engages regularly with the CCDH as it does other stakeholders in this field. DCMS confirmed you did not have access to sensitive information whilst in office and did not make any decisions specifically affecting the organisation.

7. DCMS confirmed it has no concerns regarding this application.