

Office of the Registrar of Consultant Lobbyists

Summary of investigation

September to November 2021

Organisation or person investigated

Longevity International CIC (“Longevity International”)

Matter(s) investigated

Whether Longevity International undertook unregistered consultant lobbying activities

Registrar’s decision

On 11 November the Registrar concluded that Longevity International undertook unregistered consulting lobbying activities in April 2021. In making representations against the penalty, Longevity International provided information and substantive assurances that resulted in the Registrar granting the appeal against the original decision and concluding that Longevity International did not undertake unregistered consultant lobbying activity in April 2021.

Summary of rationale for decision

In April 2021, Longevity International took part in a video launch of the All-Party Parliamentary Group on Longevity (“the APPG”) report on Levelling Up. The Secretary of State for Health and the Chief Medical Officer (“CMO”) also presented at the launch.

Longevity International was, at the time of the event, paid as a support provider (secretariat) for the APPG. Participating in the event alongside the Secretary of State and the CMO constitutes consultant lobbying by Longevity International on behalf of their client, the APPG.

As unregistered consulting lobbying is a statutory offence, a notice for a civil penalty was issued. In making representations against this notice, Longevity International provided information and substantive assurances that they had no direct contact with the Secretary of State nor the CMO before, during or after the event. As a result, the Registrar granted the appeal and did not issue a penalty.

Chronology

Date	Action
9 April	The APPG’s 9 April 2021 Levelling Up Health Launch. A video of this launch shows presentations from a Secretary of State, the CMO and Longevity International, the APPG support provider (secretariat).

Date	Action
15 September	Formal letter from the Registrar to Collider Health (the APPG's current support provider) giving background on the requirement for registering; asking if their activities in general fall within the criteria to be registered; and in particular with reference to Collider Health's APPG support role and citing the 9 April 2021 video.
20 September	Email from APPG Secretariat confirming Collider Health is the APPG support provider from 1 September 2021; giving links to the Governance Framework and Income and Expenditure Statements and stating that any communication with Ministers or Permanent Secretaries always comes from the APPG's Chair and the Longevity International role was to present some of the work in the APPG's Levelling Up report.
27 September	ORCL email asking whether Collider Health is paid to provide support services to the APPG and whether Collider Health VAT registered.
27 September	Email from the APPG Secretariat stating a proportion of time spent by Collider Health on APPG secretariat services is paid (through funds donated by sponsors); and Collider Health is VAT registered.
1 November	Letter from the Registrar explaining that the 9 April event seems registerable and giving the opportunity to respond. Also asking if Longevity International was paid to provide support services to the APPG and whether Longevity International is VAT registered.
2 November	Email from the APPG Secretariat stating the event on 9 April was not registerable; that the APPG's relatively low-cost work is supported by charities and corporate sponsors who have no control over outcomes; that Longevity International's involvement at the event was to communicate aspects of the report.
11 November	Letter from the registrar giving the investigation outcome and that a Notice of Intention for a penalty will follow. The outcome of the investigation of Collider Health is provided in a separate summary.

Update to chronology following 11 November

Date	Action
11 November	Registrar issues a penalty notice for unregistered consultant lobbying, giving Longevity International 30 days to make representations in writing.
22 November	Longevity International sends representations against penalty notice and provides information and substantive assurances that they had no direct contact with the Secretary of State nor the CMO before, during or after the event.

Date	Action
26 November	Registrar writes to Longevity International informing them that he has granted the appeal, will not proceed with the penalty and the case summary will be updated.

26 November
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