

Office of the Registrar of Consultant Lobbyists

Summary of investigation

November 2021

Organisation or person investigated

Mr Stephen Brine MP ("Mr Brine")

Matter(s) investigated

Whether Mr Brine conducted unregistered consultant lobbying activity.

Registrar's decision

Mr Brine did not conduct unregistered consultant lobbying, based on information provided.

Summary of rationale for decision

Mr Brine is not registered for VAT. Registration under the Value Added Tax Act 1994 is one of three conditions that define consultant lobbying. On that basis, the webinars Mr Brine hosted for Sigma Pharmaceuticals are not registerable under the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 ("the Act").

Chronology

Date	Action
9 November	Report in The Times regarding Mr Brine's work for Sigma Pharmaceuticals and a video meeting with the Vaccines Minister
11 November	Formal letter from the Registrar to Mr Brine giving background on the requirement for registering and asking if his activities fall within the criteria for registration. In particular, but not limited to, the meeting in February 2021, mentioned in media reports.
16 November	Letter from Mr Brine explaining the video meeting was a webinar for community pharmacists and providing a link; stating this was not consultant lobbying; and providing links to two further webinars, for transparency.

Date	Action
19 November	Letter from the Registrar stating that two of the events would be registrable if the other two tests in the Act apply. Requesting information on whether this was a paid communication and whether Mr Brine, or any organisation he receives payment from Sigma Pharmaceuticals through, is VAT registered.
24 November	Letter from Mr Brine stating he is not VAT registered.
26 November	Letter from the Registrar to conclude the investigation and to provide advice to ensure future compliance with the Act.

26 November 2021

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