

Office of the Registrar of Consultant Lobbyists

Summary of investigation

26 February 2021

Organisation or person investigated: Public Policy Projects Limited (“PPP”)

Matter(s) investigated: Following a query from a journalist, this investigation was to determine if PPP is an unregistered consultant lobbyist and in particular whether a meeting on 21 August 2020 (“the meeting”) constituted consultant lobbying.

Registrar’s decision: Based on the information provided and assurances given, PPP’s activities do not currently constitute consultant lobbying.

Summary of rationale for decision: My formal guidance covers a number of issues to be considered by think tanks in relation to registration, including: *“If funding is provided for a specific project, but the funder cannot exercise control over the outcome of the project, the activity is unlikely to be registerable. This is because any resulting communication would be expressing the think tank’s views, rather than being on behalf of a client.”*

PPP provided details of how they operate and comprehensive assurances that the views they communicate are those of PPP, not those of clients or funders. In particular, clients cannot influence the outcome of research projects. PPP also provided details of the meeting which was in fact a PPP webinar co-chaired by a Deputy Chair of PPP, Baroness Blackwood, and addressed by Lord Bethell, a minister at the Department of Health and Social Care.

Based on the assurances from PPP about how they work and details of the meeting, I am satisfied that PPP’s current activities do not constitute consultant lobbying.

Chronology:

16.2.21	Email received from a journalist, asking if ORCL received any returns on Public Policy Projects Ltd (PPP) that have not yet been published. The query stemmed from published evidence of a meeting between PPP, Baroness Blackwood and Lord Bethell, Parliamentary Under Secretary of State at the Department of Health and Social Care.
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17.2.21	Formal letter from the Registrar to PPP giving an overview of the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 (the Act); asking PPP to consider whether they undertake communications that fall within the scope of the Act; and about the meeting between Baroness Blackwood, PPP and Lord Bethell on 21 August 2020 to discuss clinical trials.
24.2.21	Response from PPP stating they define their own projects, accepting funding but not briefs from clients; they keep editorial control of their publications; and they speak with public officials to promote discussion on PPP policy proposals, not on behalf of clients. Regarding the meeting of 21 August, PPP stated it was a webinar co-chaired by Baroness Blackwood and Dr Jonathan Sheffield and addressed by Lord Bethell. It was held as part of the work of the Clinical Research Coalition, initiated by PPP, in May 2020 through a public call for evidence from those interested in the implications of the Covid pandemic for clinical research in the UK. This call led to written contributions and a series of webinars in which speakers were drawn from a broad spectrum of thought leaders in the sector.