

Summary of investigation

January – February 2025

Organisation or person investigated

Collider Health Limited (“Collider Health”) and Business for Health CIC (“B4H”)

Matter(s) investigated

Whether Collider Health and/or B4Hh conducted unregistered consultant lobbying

Registrar’s decision

Based on information and assurances provided, Collider Health and B4H have not conducted unregistered consultant lobbying in relation to the matter under investigation.

Summary of rationale for decision

Based on substantive and unequivocal written information provided, Collider Health and B4H have not conducted unregistered consultant lobbying.

Under the Transparency of Lobbying, Non-Party Campaigning and Trade Union administration Act 2014 (“the Act”), a registrable communication is made by a VAT registered company or individual communicating with a Minister, Permanent Secretary (or equivalent) on behalf of a paying client.

Collider Health: provided assurances that B4H was not a paying client at this time.

Business for Health: Assurances were given that all funding received by B4H is subject to a clause which gives independent control of the content of funded projects to the Board of B4H, not the funder(s). The Registrar’s [guidance](#) explains an exemption for Think Tanks on the grounds that the communications are not in return for payment and this currently applies to B4H. The guidance includes:

‘If funding is provided for a project, but the funder cannot exercise control over the outcome of the project, the activity is unlikely to be registrable. This is because any resulting communication would be expressing the think tank’s views, rather than being on behalf of a client. An independence clause in a funding agreement or contract is indicative of an absence of control by a funder.’

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Chronology

Date	Action
6 Jan 2025	B4Hh newsletter includes an article stating 'Business for Health met with Tom Riordan, new second permanent secretary to Wes Streeting, Health Secretary, on 18 December.'
10 Jan 2025	Email from the Office of the Registrar of Consultant Lobbyists ("ORCL") to Collider Health/B4H, asking if the meeting was arranged by or attended by anyone who was not an employee at Business for Health.
14 Jan 2025	Email from Collider Health/B4H to ORCL stating the meeting was initiated by the Department for Health and Social Care ("DHSC").
14 Jan 2025	Email from ORCL to Collider Health/B4H asking if the meeting was attended by anyone who was not an employee of B4H.
17 Jan 2025	Email from Collider Health/B4H to ORCL confirming that B4H does not have employees
17 Jan 2025	Email from ORCL to Collider Health/B4H asking about VAT registration and clients.
19 Jan 2025	Email from Collider Health/B4H to ORCL stating Collider Health was not being paid by B4H.
21 Jan 2025	Formal letter from the Registrar to Collider Health/B4H giving background on the requirement for registering and asking if their activities fall within the criteria to be registered with particular reference to, but not limited to, the DHSC meeting on 18 December 2023.
4 Feb 2025	Response from Collider Health/B4H providing assurances that Collider Health was not paid directly nor indirectly by B4H at this time and explaining the funding for B4H.
11 Feb 2025	Letter from the Registrar concluding his investigation.

11 February 2025

Office of the Registrar of Consultant Lobbyists

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