

Methodological Note

General Considerations

This methodological note details the methods applied by Britannia Pharmaceuticals Ltd with regards to the collection and submission of all transfers of value (TOVs) within the scope of The ABPI Code of Practice.

All TOVs disclosed had a payment made between 1st January 2022 and 31st December 2022. These payments do include some activities conducted in 2021 where payment was made in 2022.

All TOVS disclosed relate to a UK HCP/HCO/ORDM.

All payments disclosed are in Great British Pounds (GBP) any payments which were made in another currency have been converted to GBP based on the exchange rate at the time of payment.

Subsistence is not within the scope of the ABPI disclosure obligations and as such no costs associated purely with subsistence have been disclosed, unless included in a 'day delegate rate' and Britannia have been unable to separate the subsistence cost from the room hire.

Definitions

HCP/HCO/ORDM – The ABPI Code of Practice definitions are applied and any TOVs made directly or indirectly to an HCP/HCO/ORDM have been reported as directed by the ABPI.

INDIRECT TOV – A TOV made via an agency or third party to a HCP/ORDM/HCO, in relation to contributions to costs of an event/s or an agency with regards to travel expenses and accommodation.

DIRECT TOV – A TOV made directly to a HCP/ORDM/HCO

Consent

- HCP consent is requested for each activity; it is requested using an electronic consent preference form.
- The consent form is stored electronically on the HCPs record on a password protected internal system designed to manage and record TOVs. The HCPs consent preference is recorded within the electronic system and the consent preference form is uploaded as evidence of consent.
- If an HCP provides partial consent, this interaction with consent granted will be disclosed.
- If an HCP declines to provide consent any transfers of value made to that HCP will be disclosed within the aggregate.

Data Collection

- An internal electronic system is used to track consent and transfers of value made to HCPs, ORDMs and HCOs.
- Consent preference and details of payments are recorded against the HCP record card. HCPs that decline to provide consent are automatically added to the aggregate, for those that consent, the consent preference form is uploaded as evidence of consent.
- HCO payments are recorded within the electronic system against the HCO.
- The data collated on the electronic system is double checked against the financial records. Finance provides a record of all payments made to HCPs/ORDMs and HCOs, this data is used to check the electronic system and highlight any discrepancies.

Britannia Nurse Service

Britannia provides a nurse service as part of the purchase price of its product, the service employs nurses internally and via an external agency.

The total cost of providing this service to the NHS has been calculated using the total salaries from all nurses and divided by the number of NHS Trusts who have a contract in place with Britannia and benefited from the nurse service in 2022. This provides an average cost per trust.

The cost is then disclosed against each NHS trust as a 'sponsorship agreement with HCOs/Third party organisations appointed by HCOs to manage an event' as this TOV cannot be disclosed elsewhere on the template as it is not considered a grant, donation, collaborative working or a contracted service (as per note M).

Donations & Grants

TOVs relating to Donations and Grants to HCOs, in cash or in kind are included within the disclosure.

Contributions to costs of events

The following TOVs have been disclosed within this column:

- Registration fees, travel and accommodation expenses associated with sponsoring HCPs to attend 3rd party conferences/company funded meetings
- TOVs provided to HCOs directly or indirectly with regards to the cost of events
- TOVs paid to a third-party agency on behalf of an HCO/s as a contribution to an event/s
- Where group accommodation and transport has been provided as a TOV, the total cost has been divided by the number of attendees and this amount has been disclosed
- The Britannia nurse service TOV to all NHS Trusts with a valid contract

Contracted Services – Expenses

Where Britannia have been unable to separate expenses from the fee for service, these amounts have been disclosed together as a total.

Cross Border Payments

Britannia Pharmaceuticals Ltd is part of the STADA Group and operates globally via affiliates and partners. Cross border payments are communicated internally and reconciled locally to ensure all relevant UK TOVs are included within this disclosure.

Patient Organisations

All TOVs provided to Patient Organisations can be accessed here:

<https://www.britannia-pharm.co.uk/grants-donations-responsibilities/disclosures>

Data Privacy

A statement around consent is included within our standard contracts and payment request forms, our consent form, which is based on the ABPI template, includes a direct email address should the HCP wish to discuss Britannia's data privacy policies further.

Research and Development

Any TOV made associated with research and development activities essential to conduct a study, conducted directly by Britannia or indirectly have been disclosed as an aggregate amount.