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# ProvepharmUK Methodological note for HCP/ORDM/HCO disclosure 2026

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The pharmaceutical industry’s relationships with health professionals (HCPs), other relevant decision makers (ORDMs) and healthcare organisations (HCOs) is a key area of public interest. Members of the public want to be confident that such relationships are appropriate and that they can trust their health professional to provide high quality care based on clinical evidence and experience. There are detailed requirements in the ABPI Code of Practice for the Pharmaceutical Industry setting out the basis of these relationships which include disclosure obligations. Since 2012, certain transfers of value have been required to be collected and disclosed. Current ABPI Code requirements mean that data identifying HCPs, ORDMs and HCOs, who have received certain transfers of value, are published on a publicly available central platform, Disclosure UK. The platform was launched in June 2016, when 2015 data was published, and currently lists data for the last three calendar years. By creating greater transparency around the pharmaceutical industry’s collaborations and partnerships with HCPs, ORDMs and HCOs, the ABPI Code requirements for disclosure of certain transfers of value aim to improve understanding and increase the public’s confidence in these relationships. The ABPI Code disclosure requirements are predominantly set out in Clauses 28 to 31 of the 2024 Code.

Provepharm Ltd and the French parent company Provepharm Life Solutions are committed to maintaining and strengthening trust and transparency with our customers and all of our partners and this is essential to the proper conduct of our commercial relations. Both companies operate under an ethical sustainable commercial charter.

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# 1 Definitions

## 1.1 Recipients

**Health professional (HCP):** For the purposes of disclosure, Provepharm regards all employees of the NHS or any private Health Care Provider involved in patient care as HCPs regardless of their professional status. In addition, Provepharm regards all registered or qualified healthcare professionals as within the scope of disclosure regardless of their NHS status. Thus, retired HCPs fall within scope and academic staff who provide clinical services and support. This includes members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine. In relation to disclosure of transfers of value, it also includes any consultant or employee of Provepharm whose primary occupation is that of a practicing health professional. HCPs who are primarily engaged by the pharmaceutical industry and do not provide direct patient care are not included.

If an HCP is deceased the assumption is the ToV will be declared unless the next

of kin contacts the company and this will be reviewed on a case-by-case basis.

**Other relevant decision makers (ORDM):** particularly includes those with an NHS role who could influence in any way the administration, consumption, prescription, purchase, recommendation, sale, supply or use of any medicine but who are not health professionals.

**Healthcare organisation:** means either a healthcare, medical or scientific association or organisation such as a hospital, clinic, foundation, university or other teaching institution or learned society whose business address, place of incorporation or primary place of operation is in Europe or an organisation through which one or more HCPs or ORDMs provide services.

**Members of the public:** refers to members of the UK public i.e. not an HCP or ORDM and includes patients and journalists.

## 1.2 Kind of ToVs

**Transfers of value:** means a direct or indirect transfer of value, whether in cash, in kind or otherwise, made, whether for promotional purposes or otherwise, in connection with the development or sale of medicines.

- A direct transfer of value is one made directly by Provepharm for the benefit of a recipient
- An indirect transfer of value is one made on behalf of Provepharm for the benefit of a recipient or through an intermediary and where Provepharm knows or can identify the recipient that will benefit from the transfer of value.

**Registration fee:** refers to a fee paid to register, enroll or sign up for a formal training course or meeting or direct funding such as sponsorship fees.

**Travel and accommodation:** means the costs of travel and accommodation, both inside and outside the UK, this excludes subsistence payments.

**Collaborative working:** means a situation where, pharmaceutical companies work with other organisations to deliver initiatives which either enhance patient care or are for the benefit of patients or alternatively benefit the National Health Service (NHS) and, as a minimum, maintain patient care.

**Support:** for an individual, means the provision of a financial contribution, in whole or in part, whether paid directly or indirectly to individual health professionals or other relevant decision makers to attend events/ meetings.

**Sponsorship:** means a contribution, financial or otherwise, in whole or in part provided by or on behalf of a company towards an activity (including an event/meeting or material) performed, organised, created, etc., by a healthcare organisation, patient organisation or other independent organisation, which there

may be some benefit to Provepharm such as a promotional stand.

**Grant/Donation:** means a grant/donation of funds, benefits-in-kind or services freely given for the purpose of supporting healthcare, scientific research or education, where Provepharm received no reciprocal benefit.

## 2 Disclosure's Scope

### 2.1 Products concerned

Prescription only Medicines

### 2.2 Company concerned

Provepharm UK

### 2.3 Excluded ToVs

Transfers of Value relating purely to medical devices

### 2.4 ToVs date

1<sup>st</sup> Jan 2025 to 31<sup>st</sup> December 2025.

### 2.5 Direct ToVs

Fee for service

### 2.6 Indirect ToVs

payments made via third party companies are treated as direct ToV

### 2.7 Non-monetary ToVs

N/A

### 2.8 ToVs in case of partial attendances or cancellation and refund

N/A

### 2.9 Cross-border activities

Provepharm headquarters and any affiliates provide Provepharm UK with the monetary value and description of the activity for each HCP or HCO paid.

### 2.10 R&D

N/A

### 2.11 Voluntary disclosure

N/A

## **3 Specific considerations**

### **3.1 Country unique identifier**

Not used

### **3.2 Self-incorporated HCP**

HCPs paid through a limited company where they are the beneficiary will be disclosed as if a direct payment was made

### **3.3 Multi-year agreements**

Where a multi-year agreement is in place payments are disclosed for the year in which the activity took place

### **3.4 Country specificities**

N/A

### **3.5 Quality Checks**

Provepharm HQs proactively informs the UK affiliates of any ToV to the UK but in addition all affiliates are asked for any ToV to UK HCPs or HCOs prior to completion of the spreadsheet. All payments are logged and cross checked with the finance department and with contracts signed and events approved to ensure no payments are missed. A second person reviews the spreadsheet prior to submission to look for inconsistencies

## **4 Data protection legal basis**

### **4.1 Consent collection**

Provepharm do not use consent as the legal basis for disclosure

### **4.2 Legitimate interests**

- Provepharm has carried out a Legitimate Interest Assessment and decided individual HCP/ORDM payments will be disclosed against those individuals using the lawful basis of legitimate interest. All HCPs are informed of this before signing any contracts.
- Due to Data Privacy law, Provepharm Ltd, based in the UK, in the reporting period used the lawful basis of legitimate interest in order to process personal data in respect of individual transfers of value. On this lawful basis, individuals are entitled to object to the processing of their personal data for this purpose. In the event of any objection which, after reconsideration of the balancing test by Provepharm, was successful, Provepharm would declare the total spend as an aggregate figure as a separate line entry within the required disclosure section

## 5 Form of disclosure

### 5.1 Date of publication

31/03/2026

### 5.2 Disclosure platform

Disclosure UK – [www.disclosureuk.org.uk](http://www.disclosureuk.org.uk)

### 5.3 Disclosure language

English

## 6 Disclosure financial data

### 6.1 Currency

GBP

### 6.2 VAT included or excluded

- Payments made to HCPs/ORDMs for the fee for service are all exclusive of VAT.
- Payments made to HCPs/ ORDMs for expenses (e.g. travel and accommodation paid directly by the HCP) in relation to service are inclusive of VAT.
- Payments made to healthcare organisations are reported exclusive of VAT

### 6.3 Calculation rules

N/A no benefits in kind were made

## 7 Additional Information

- Where an HCP has indicated they are independent of any organization, their principle practice has been disclosed as "N/A"
- Where transfers of value are not individually identifiable, such as group cost, then the total amount will be apportioned equally between all those HCPs/ORDMs who were the beneficiary of the support.
- Where support has been provided for a HCP e.g. travel and accommodation for an event, this is disclosed in the year of the event. This may differ from the year in which the booking was made.
- Payments to healthcare organisations are disclosed on a 'per activity' basis
- Payments to healthcare organisations in respect of stand space may be inclusive of food and beverages
- Name matching (from multiple sources)
  - In those circumstances where no first name has been provided, i.e. only an initial, yet another entry may appear to be the same individual, Provepharm has disclosed this as two separate entries.

- In those circumstances where the first name, surname, place of work and address are the same, this has been assumed to be the same person.