

Methodological Note to 2022 Disclosure Report for Besins Healthcare (UK) Limited

LIST OF ABBREVIATIONS

ABPI	Association of the British Pharmaceutical Industry
BHUK	Besins Healthcare (UK) Limited
EFPIA	European Federation of Pharmaceutical Industries and Associations
GDPR	General Data Protection Regulation
HCO	Healthcare organisation
HP	Health professional
ORDM	Other relevant decision maker
TOV	Transfer of value
UK	United Kingdom

DEFINITIONS

Transfer of Value (TOV)

The term 'transfer of value' (TOV) 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 a company for the benefit of a recipient. An indirect transfer of value is one made on behalf of a company for the benefit of a recipient or through an intermediate and where the company knows or can identify the recipient that will benefit from the transfer of value. ¹

Health Professional (HP)

Health professionals (HPs) includes any member of the medical, dental, pharmacy or nursing profession and any other person who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine. In relation to the annual disclosure of transfers of value, the term also includes any employee of a pharmaceutical company whose primary occupation is that of a practising health professional. ¹

Healthcare Organisation (HCO)

A healthcare organisation (HCO) is 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 healthcare professionals or other relevant decision makers provide services. ¹

Other Relevant Decision Maker (ORDM)

The term 'other relevant decision maker' (ORDM) particularly includes someone 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 is not a health professional. ¹

INTRODUCTION

Besins Healthcare UK Limited (BHUK) is committed to transparent interactions with Health Professionals (HPs) and Healthcare Organisations (HCOs).

HPs and HCOs offer expert knowledge on patients' behaviour and management of diseases and are the primary point of contact with patients. This plays a valuable role in informing BHUKs efforts to improve patient care.

BHUK is committed to communicating transfers of value made to HPs and HCOs in a transparent manner. In doing so, all reasonable efforts will go into making sure they are accurate, valid and complete. BHUK complies with all laws, rules and regulations. Laws in the European Union protect the rights of citizens in relation to the way their personal data is processed. HPs are covered by Data Privacy laws, and this affects the way in which BHUK can publish the HP's transfers of value. BHUK will seek permission (consent) from the HP to individually publish their transfers of value and as such HPs have the right to opt out of individual disclosure.

BHUK is committed to disclosing all TOV to HPs and HCOs in accordance with its commitment to the ABPI Code of Practice and in alignment with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code on Disclosure on Transfers of Value.

All required TOVs made in the UK from 1st January 2022 to 31st December 2022 are disclosed on the ABPI central platform.

This document summarises the approach taken by BHUK in calculating the figures provided and considers;

[1] ABPI Code of Practice for the Pharmaceutical Industry 2021. Available from:

<https://www.abpi.org.uk/publications/code-of-practice-for-the-pharmaceutical-industry-2021/>

[2] EFPIA Code of practice 2019. Available from:

<https://www.efpia.eu/relationships-code/disclosure-of-payments-to-hcps/>

[3] PMCPA Disclosure-Methodological Notes points for consideration. Available from:

<https://www.pmcpa.org.uk/guidance-and-qas/guidance/disclosure-methodological-notes-points-for-consideration/>

HOW WAS THE DISCLOSURE ORGANISED?

Data were collected, reconciled, and reported on the BHUK disclosure template. This tracker is used by BHUK to track payments to HPs, ORDMs and HCOs within all EFPIA member countries. All financial TOVs were reconciled against the contractual agreements, the tracker recordings and the actual payments made.

DISCLOSURE CATEGORIES

Contribution to costs of Events

Costs declared include registration fees and travel and accommodation in relation to financial support of HPs and ORDMs to attend meetings. Costs related to subsistence (food and beverages) to HPs are not required to be declared.

Fees for contracted services, and associated related expenses agreed in the fee for contracted services

This includes the following services: speaker and chairperson fees, consultancy fees and training.

Sponsorship agreements with HCOs/third party organisations appointed by HCOs to manage an event

BHUK discloses all payments made to healthcare organisations and third-party organisations in relation to events / meetings. This includes direct funding such as sponsorship fees and fees paid to erect an exhibition stand, and indirect support via organisations managing an event/meeting on behalf of the HCO. Disclosure includes subsistence (food and beverages) in relation to sponsorship to a HCO, institution or other organisation in relation to their own event.

Donations and Grants to HCOs

Donations and Grants to HCOs that support healthcare, including donations and grants to institutions, organisations or associations that are comprised of HPs and/or that provide healthcare. For financial grants the date of the TOV has been recorded as the date the payment was processed by BHUK.

Collaborative working

BHUK was not involved with any collaborative working projects with HCOs in 2022.

Research and development

All payments to HCOs related to research and development are disclosed as an aggregate figure in accordance with the ABPI Code of Practice.

Patient organisations

There are no disclosures in scope of this category in 2022.

OTHER CONSIDERATIONS

Crossborder payments

All disclosures are made in the country in which the HP or HCO practice is located. Payments made to a UK based HP or organisation by Besins entities located in other countries are disclosed within the UK, regardless of the source of funding.

Multi-year contracts

When BHUK has contracted with an HP, ORDM or HCO for a period that spans more than 1 calendar year, only transfers of value executed during the calendar year will be included in the disclosure. The remainder of the contract values will be disclosed in future relevant disclosure periods.

Over the counter medicines and medical devices

There are no disclosures in scope of this category for 2022.

VAT

Where payments were made and VAT was applicable, the VAT has been excluded for the purposes of disclosure. Therefore, all values provided are exclusive of VAT. There are no other tax considerations.

Exchange rate and currencies

The amounts disclosed are those actually paid by BHUK. They may differ slightly from the amounts received by the HP/HCO as they do not take into consideration any exchange fees or other fees applied by the recipient's bank.

On occasions payments are made in a currency other than UK sterling. In these situations, the exchange rate will mean the exact equivalent in sterling according to the date on which the conversion calculation was made. All disclosures will be displayed in UK sterling. The UK sterling totals will be calculated using the exchange rate on the day of payment using Currency Exchange Rates-International at xe.com. Readers should understand that the total amounts disclosed in sterling could therefore vary slightly from the exact amount paid in the local currency; variations will be greater if there have been significant movements in exchange rate during the reporting period.

Time of payment

The date recorded for the TOV is the date the payment was processed by BHUK.

Consent for disclosure and GDPR

In accordance with Data Privacy law, BHUK has obtained and retained records of consent from HPs on an individual activity basis prior to disclosing personal data such as individual transfers of value. Where permission has not been obtained or where HPs have refused consent, BHUK has declared the total spend as an aggregate figure given on a separate line entry within the relevant disclosure category and the % of non-consenting HPs given as a percentage of the total HPs receiving a TOV.

CONTACTS

For other enquiries related to the information in either this Methodological Note or the 2022 Disclosure Report please contact: information@besins-healthcare.com.