

## **Disclosure of Transfers of Value to Health Care Professionals**

### **Stirling Anglian Pharmaceuticals Limited**

#### **Methodological Note – 2016**

1. Introduction. As a non-member company that has agreed to abide by the ABPI Code of Practice, Stirling Anglian Pharmaceuticals Limited has registered to disclose transfers of value to Health Care Professionals for the calendar year 2016. The aim of this methodological note is to define the way in which Stirling Anglian Pharmaceuticals has approached this task and to provide assurance that disclosure is robust and takes due account of the ABPI Code of Practice and requirements related to the handling of personal information.
2. Stirling Anglian Pharmaceuticals acknowledges the content of the ABPI Code of Practice 2016 and in particular Clause 24 on transfers of Value and the definitions contained in Clauses 1.4 and 1.9 of the Code. Stirling Anglian also notes that the Code, as a whole, applies to this process.
3. Stirling Anglian Pharmaceuticals endorses the ABPI position on disclosure of payments and encourages disclosure by HCP's. It is recognised that positive consent to disclose is required and we have taken steps to provide HCPs with opportunities to provide such consent by electronic communication.
4. Stirling Anglian Pharmaceuticals is a small pharmaceutical company. Marketing is restricted to the UK and to Malta (no payments have been made to HCO's and HCP's in Malta). While licenses are held for a number of European countries no payments have been made to HCPs or HCOs in these countries.
5. Tax Considerations. All payments made by Stirling Anglian are gross payments and no deductions are made by the company for tax or National Insurance. This remains the responsibility of the recipient. Where VAT is charged in an invoice or a VAT number is shown, the invoiced amount includes VAT at the current UK rate.
6. Currency. All payments made by Stirling Anglian to HCPs and HCOs in 2016 were in pounds Sterling. Thus there are no issues with currency conversion rates.

7. Cross-Border Payments. Stirling Anglian has made no cross-border payments in 2016.
  
8. Multi-Year Contracts – Stirling Anglian Pharmaceuticals engages HCPs and HCOs on a per activity basis. There are currently no multi-year contracts between HCPs and Stirling Anglian.
  
9. Over-the-counter transfers of value. Stirling Anglian did not provide any over-the-counter transfers of value in 2016.
  
10. Medical Device transfers of value. There have been no medical device transfers of value made by Stirling Anglian in 2016.
  
11. In the view of Stirling Anglian Pharmaceuticals, we believe the disclosures made are consistent with the ABPI Code and Data Protection legislation. The details given are current to the best of our knowledge.
  
12. We have made the following definitions:
  - Sponsorship – this is defined as any payment made to a HCP or HCO that supports the holding of a meeting for educational or other purposes (such as an HCO promulgating policy or items of clinical interest). This includes provision of payments to HCOs to allow promotional activity to be associated with such meetings (e.g. promotional stands). Where a meeting is sponsored by a number of companies, only the Stirling Anglian contribution is noted as information from other companies is not available to us. This is shown as a transfer of value to the HCO sponsoring the meeting.
  - Further, the definition of sponsorship includes any instance where Stirling Anglian has contributed, in whole or in part, to the costs of registration, travel and accommodation of a HCP at any meeting or conference. This is shown, with consent, as a transfer of value to that HCP.
  - Grant – Stirling Anglian provides grants in a way consistent with Clauses 18 and 19. For operational purposes a grant would be provided for a specific pre-defined activity or service.
  - Donation - a donation is defined as a payment or series of payments made to an organisation, usually a charity or a patient organisation to assist in the general activities of that organisation. Stirling Anglian would not specify the use to be made of such funds, nor would it request or require any specific report on the outcome of any activity for which funds were used. Stirling Anglian is mindful of the provisions of Clause 18.1 in this regard. No donations were made by Stirling Anglian to HCPs or HCOs in 2016.

13. Consent. Stirling Anglian has assumed consent for disclosure for all NHS HCOs – this is consistent with the NHS policy of openness and transparency. This applies principally to Stirling Anglian sponsorship for meetings of Health Care Professionals. In this activity, Stirling Anglian is mindful of the provisions of Clause 22 in terms of venues, hospitality and the attendees of such meetings. For individual HCPs, Stirling Anglian requested specific consent to disclose by electronic response in March 2017. Consent for 2016 was based on a request to disclose all payments to each individual. For the future, Stirling Anglian is reviewing contracts with HCPs to ensure consent to disclosure forms part of the initial engagement process.
  
14. Non-monetary transfers of value. There have been no non-monetary transfers of value to HCPs or HCOs in 2016.
  
15. Working with other pharmaceutical companies. Stirling Anglian has no joint projects with other pharmaceutical companies within the reporting period. Thus, no formal agreements have been required in 2016. We are mindful that where multiple sponsorship of an event occurs that the total amount of sponsorship could become problematic. We attempt to liaise with organisers to establish that total sponsorship for any event or meeting is consistent with the letter and spirit of the Code.
  
16. We hope that this methodological note provides assurance as to the steps taken by Stirling Anglian Pharmaceuticals to provide information in this second year of this disclosure process. We aim to build upon and refine our methodology in future years and to take a pro-active stance that encourages consent to disclosure at the point at which an activity is agreed with a HCP or HCO.