

Methodology for the submission of disclosure of payments to Healthcare professionals and organisations required under the ABPI guidelines.

General Summary of 2016 Disclosure

In line with the requirements for Transfer of Value disclosure by EFPIA and the ABPI in the UK this disclosure includes all transfers of values made to healthcare professionals and healthcare organisations during the period 1 January 2016 and 31 December 2016. This document is a summary of our assumptions and definitions made in order to generate our disclosure for this period.

Definitions

HCP – The term ‘health professional’ includes members of the medical, pharmacy and nursing professions and any other persons who in the course of their professional activities are actively administering, prescribing, purchasing, or supplying a medicine. We have excluded HCPs who are no longer practicing.

HCO – The term ‘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 health professionals or other relevant decision makers provide services.

ORDM - The term ‘other relevant decision makers’ 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.

Data Privacy

A statement around consent is included within our standard contracts and payment request forms. In addition, we have sent each HCP their disclosable transfer amount details, along with an ABPI guidance leaflet asking them to confirm the amount to be disclosed, at this point the HCP was also given a further opportunity to withdraw consent prior to final submission of data on the ABPI portal. Documentation will be kept on file for a period of 7 years.

Any transfers of value for which consent has not been given and also where we have received no response to our correspondence in February/March 2017 around individual amounts are declared as an aggregate disclosure.

Transfers of value to HCOs have been included as further consent is not deemed applicable under data privacy requirements.

Research and Development

Any transfer of value connected to research and development has been disclosed as an aggregate amount.

Transactions

All transactions are generally in pounds sterling; where this is not the case, an appropriate average annual exchange rate has been used to translate into a sterling equivalent and this has been recorded on our financial systems. This also applies to multi-year transactions.

Complicated Payment Routes

Where transfer of value to a HCP or HCO has taken place via a third party e.g. events agency, we have obtained a detailed breakdown from this third party specifying transfer of value per named HCP or HCO. These values have been included in our disclosures as detailed above.

Where limited companies are owned by a sole HCP, these transfers of values have been declared against the named HCP.

Where limited companies are not owned by an HCP and do not exclusively employ practicing HCPs, these have been excluded from the disclosure.

Donations, Grants and Sponsorship

These are defined as projects where the company has no influence over the project content and have been given as independent medical education grants. Where medical education grants have been given to HCPs and HCOs, these have been declared against the named HCP or HCO.

Meetings, Sponsorship and Hospitality

Direct funding e.g. sponsorship as well as indirect support e.g. registration fees have been included in the disclosure on a named or aggregate basis depending on consent given. As food is assumed to be outside the scope for disclosure, this has not been included. Expenses such as travel costs for HCPs to attend company-led meetings have also been included in the disclosure.

Cross Border Payments

Cross border payments have been disclosed against the country in which the HCP is registered. Payments for HCPs registered in the UK are included in our submission on the ABPI portal. Payments to HCP's outside of the UK can be found on our website on or before 1 July 2017.