



UNITED KINGDOM

METHODOLOGICAL NOTE

on disclosure of transfers of value to healthcare professionals and healthcare organisations

(Information for Reporting of 2017 Data in 2018)

1. Introduction

“Collaboration between industry and health professionals benefits patients. It is a relationship that has delivered numerous innovative medicines and changed the way many diseases impact on our lives. Industry and health professionals collaborate in a range of activities from clinical research, sharing best clinical practice and exchanging information on how new medicines fit in to the patient pathway. Bringing greater transparency to this, already well-regulated, vital relationship is about strengthening the basis for collaboration in the future. Society has increasingly high expectations for transparency, none more so than in healthcare” (EFPIA).

Eisai wants to ensure it meets those expectations.

This note accompanies the disclosure made by Eisai under EFPIA and national pharma association codes on disclosure of Transfers of Value (ToV) from pharmaceutical companies to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organisations (HCOs). This note includes a general summary and any country specific considerations.

2. Definitions

Eisai recognises HCPs, ORDMs, HCOs and ToV according to the EFPIA or national pharma code definitions (where applicable) for the disclosure period.

3. Disclosure’s scope

Eisai is disclosing ToV to HCPs, ORDMs and HCOs in the United Kingdom.

3.1 Excluded ToV

Eisai has concluded that certain ToV are not covered by EFPIA and the ABPI Code therefore, have not included them in this disclosure:

Commercial or Promotional ToV:

- Food and drink costs are excluded from Eisai organised and sponsored meetings. However, they may be included if the food and drink was an integral and inseparable part of the contribution to the cost of the event or part of the sponsorship agreement.
- ToV made by another company under a co-promotion agreement with Eisai are disclosed by the other company and not by Eisai.
- ToV paid as part of a market research study where Eisai does not know the identity of the participating HCPs or ORDMs will be disclosed on an aggregated basis if available.
- Event costs, such as the rental of equipment associated with one-off events are excluded e.g. room hire, projector rental, audio visual equipment. However, they may be included if part of a sponsorship agreement or where Eisai has paid a HCO for use of their facilities.
- ToV made to a group of HCPs and/or ORDMs, such as group transportation e.g. bus chartering to an event will be disclosed on an aggregated basis, if available.

Research & Development ToV:

- Eisai lending laboratory equipment to a HCO as part of a study (where such activity is permitted under local pharma rules).

3.2 ToV date

Eisai discloses the ToV using the date the payment was made to the HCP, ORDM or HCO.

3.3 Direct ToV

ToV can be made to the HCP, ORDM or HCO directly e.g. payment to an HCP for giving expert advice in an Advisory Board.

3.4 Indirect ToV

ToV can be made to the HCP, ORDM or HCO indirectly e.g. registration fees paid to a conference provider on behalf of an HCP.

When a third party is used to pay a HCP, ORDM or HCO the information required for disclosure may be provided to Eisai by the third party and uploaded to the disclosure software.

Where the ToV (net of agency fee) is known and consent to disclose has been given by the HCP/ORDM, the value to the individual HCP/ORDM will be disclosed. Otherwise the disclosure will be made in aggregate.

Eisai will make every effort to disclose against individual HCPs or ORDMs where it is known that they have undertaken activities on behalf of a HCO and where the HCO have been paid for this service.

The HCP or ORDM will be contacted for their consent to disclose the fee for this activity if it has not already been obtained. If consent is not obtained the disclosure will be made in aggregate.

3.5 ToV in case of partial attendances or cancellation

In the case of cancellation of a meeting or event, and where an HCP, ORDM or HCO does not receive a benefit, the ToV is not included in the disclosure.

In the case of partial attendance, any ToV received by an HCP, ORDM or HCO as a benefit will be included in the disclosure.

3.6 Cross-border activities

Disclosures of ToV are made pursuant to the national code of the country where the HCP/ORDM principally practices or where the HCO has its primary place of operation, whether the ToV occurs in or outside of that country.

If a HCP/ORDM changes their country of practice then that information will be disclosed for the principle place of operation at the time of disclosure.

4. Specific considerations

4.1 Self-incorporated HCP/ORDM

Our general principle is that where an HCP/ORDM is the sole owner of their own company and Eisai have made a ToV to that company, Eisai will disclose against the individual HCP/ORDM.

4.2 Multi-year agreements

Any payments made against a multi-year contract are disclosed in the period covering the actual payment date.

4.3 Multiple HCO agreements

We disclose the amount paid to the Eisai ToV vendor set up on our finance system

5. Consent management

Where HCP/ORDM consent has been obtained, Eisai discloses ToV on an individual basis. Where HCP/ORDM consent has not been obtained, Eisai discloses ToV on an aggregate basis.

Eisai make every effort to understand an individual HCP's/ORDM's position on consent. If we are unable to ascertain consent we will disclose ToV on an aggregate basis.

Eisai is not required to obtain consent from HCOs and disclose all HCO ToV.

5.1 Consent collection

Consent for individual disclosure was requested in each country. This was done on a contract by contract basis and/or as a one off request (where applicable).

5.2 Management of recipient consent withdrawal

Requests must be made in writing to hcpdisclosureteam@eisai.net or UK HCP Disclosure Team, Eisai Europe Limited, European Knowledge Centre, Mosquito Way, Hatfield, AL10 9SN, UK. When written requests are received Eisai updates the transparency reporting system to reflect the request. When consent is withdrawn the ToV are added to the aggregated ToV.

5.3 Management of recipient's request

Requests must be made in writing to hcpdisclosureteam@eisai.net or UK HCP Disclosure Team, Eisai Europe Limited, European Knowledge Centre, Mosquito Way, Hatfield, AL10 9SN, UK.

5.4 Partial consent

Where only partial consent is obtained for an HCP or ORDM throughout the payment year, or consent is withdrawn, Eisai will disclose the total ToV in aggregate form.

6. Disclosure Form

Eisai uses a centralised platform for UK disclosure

7. Disclosure financial data

7.1 Currencies

Disclosures are made in the local currency. Foreign exchange rates are based on published commercial rates used internally by Eisai.

Exchange rates are applied to ToV, including R&D ToV, using a yearly average exchange rate.

7.2 VAT included or excluded

Commercial or promotional ToV are disclosed using gross values.

R&D ToV are reported gross or net depending on how the data is captured and reported in third party payment systems.

7.3 Calculation rules

Donations are disclosed using the fair market value (FMV) of the item.

