

Methodology for the submission of certain payments and other transfers of Values (ToV) made by Britannia Pharmaceuticals to UK HCPs (Healthcare Professionals), HCOs (Healthcare Organisations) and ORDMS (Other Relevant Decision Makers) for public disclosure on the ABPI Central Platform

General Summary of 2018 Disclosure

This disclosure submission includes those payments and ToVs that are subject to Britannia disclosure obligations covering the period 1 January 2018 to 31 December 2018. This document is a summary of our assumptions and definitions made in order to generate our disclosure for this period.

Definitions

HCP – The term Healthcare 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 or registered with the appropriate bodies.

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 maker’ 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 healthcare 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 onto the ABPI disclosure 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 2019 around individual disclosure amounts are declared as an aggregate.

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

HCP Consent

HCPs disclosure is made by name where consent has been obtained, and where it has not the amount has been added to the aggregate. Consent preferences are reconfirmed on an annual basis prior to submission. HCOs do not currently need to give consent.

Research and Development

Any transfer of value and payment made to HCPs, ORDMs and HCOs associated with research and development activities conducted by Britannia or on Britannia's behalf has been disclosed as an aggregate amount. It includes travel, accommodation and honorarium. Site costs are excluded.

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 a payment has been made to a HCP or HCO via a third party e.g. events agency, Britannia have obtained a detailed breakdown and when possible those payment made to identifiable HCPs/ORDM are disclosed on an individual basis subject to consent.

Where HCOs have numerous HCPs, and the identity of the individual HCP is known, disclosure is against the individual. Alternatively, if the service is carried out by an unknown HCP/HCPs, disclosure is against the HCO.

Donations, Grants and Sponsorship

Payment made to HCPs or HCOs who successfully receive funding from Britannia in the form of a grant or donation are disclosed in this submission.

Meetings, Sponsorship and Hospitality

Registration fees, travel and accommodation expenses associated with sponsoring HCPs to attend 3rd party conferences and the like are disclosed on a named basis subject to consent. Travel and accommodation expenses for HCPs attending company meetings have also been included in the disclosure.