

Methodological Notes

Disclosure by Tillotts Pharma of payments to UK health professionals and health care organisations in 2019

The ABPI Code of Practice mandates the public disclosure in 2020 of certain transfers of value made during 2019 to UK health professionals and health care organisations. Where permission to disclose transfers of value is refused by individual health professionals, the transfer of value made to them is disclosed in an aggregated fashion. The disclosure data is published on a central platform, hosted by the ABPI and made available to anyone who requests access. The ABPI Code requirements on disclosure are predominantly set out in Clause 24, however information can also be found in Clauses 1, 19, 20, 21, 22 and 23.

The methodological notes below explain the data Tillotts Pharma have disclosed and how the data have been prepared, to assist the reader's understanding. Inclusion of this methodological note alongside the disclosure data is also mandated by the ABPI Code of Practice in Clause 24.10.

VAT

VAT is excluded from all disclosures of transfer of value.

Currency

All disclosures are made in Pounds Sterling (£). Where the original payment was made in another currency (for example US Dollars (\$) or Euros(€)), the sum was converted to pounds at the exchange rate prevailing at the time of the original payment.

Consolidated Disclosures of the Corporate Group and Cross border payments

The disclosures represent the consolidated transfers of value made by the Tillotts Pharma corporate group in line with the EFPIA Disclosure Code's dictate that separate entities belonging to the same multinational company (which could be the parent company and subsidiary company) shall be deemed to constitute a single company. The disclosures represent payments by Tillotts Pharma UK Ltd and Tillotts Pharma AG, of which Tillotts Pharma UK Ltd. is a wholly owned subsidiary. These methodology notes apply equally to the disclosures made by Tillotts Pharma AG and Tillotts Pharma UK Ltd.

Data Protection

Consent to disclose data

In countries where it is required by applicable data protection laws, Tillotts has taken all reasonable steps to obtain consents from the HCPs, and HCOs, as applicable, to publicly disclose payments and other transfers of value. In accordance with EFPIA guidance, partial consents are not acceptable. If consent is not provided, the data will be reported on an aggregate level only.

Consent collection and withdrawal

Tillotts respects applicable data protection laws. If a stakeholder withdraws the provided consent, Tillotts will adjust the publication accordingly within a reasonable time.

Data included

The data disclosed by Tillotts Pharma is consistent with the requirements of the ABPI Code of Practice. The data can be categorised as follows:

Sponsorship of health professionals to attend educational events

Disclosed data includes all travel costs, such as flights, transfers from airport to hotel or congress venue, train and underground/metro journeys. The disclosure data also includes accommodation costs such as hotel rooms, but does not include food and drink costs. The disclosure data also includes the registration fee, where applicable, for the health professional to be registered to attend the educational event. These data relate to congresses held during 2019, even if invoices relating to payments made were settled in the next calendar year.

Payment of consultants who provide services to Tillotts

Disclosed data includes the payment of honoraria to UK health professionals who provided services to Tillotts during 2019, even if payment was made in the next calendar year. Where applicable, the disclosure data also includes payment of reasonable expenses to such consultants in the delivery of their services, such as travel expenses or accommodation expenses.

Donations, grants and benefits to health care organisations

Disclosed data includes transfers of value to UK health care organisations such as the provision of meeting organisation services by Tillotts Pharma, payment to support educational meetings and Medical Educational Goods and Services which enhance patient care or benefit the NHS and maintain patient care. Tillotts Pharma's support was contingent upon all such transfers of value being disclosed publically.

Research & Development

Research & Development transfers of value are disclosed in the aggregate and encompass transfers of value to UK health professionals and UK health care organisations related to non-clinical studies (as defined in the OECD Principles of Good Laboratory Practice), clinical trials (as defined in Directive 2001/20/EC), non-interventional studies (prospective in nature and involving the collection of data from, or on behalf of, individual or groups of health professionals specifically for the study), as well as costs that are subsidiary to these activities.