



Dermal Laboratories Limited, Tatmore Place, Gosmore, Hitchin, Herts. SG4 7QR, UK
Tel: +44 (0)1462 458866 Fax: +44(0)1462 420565 www.dermal.co.uk

Methodological Note – 2019 Disclosure of industry payments to Healthcare Professionals in accordance with the ABPI code of practice

1. Background

The collaborative partnerships between the pharmaceutical industry and healthcare professionals (HCPs) and healthcare organisations (HCOs) has long been a positive driver for improved medicines, patient care and medical research. The types of activities HCPs and HCOs get involved with generally include medical education, giving advice in relation to research strategies and medicines use, and participation in clinical trials. These interactions are properly regulated by a clear framework which provides for HCPs and HCOs to be fairly compensated for their time and expertise. Pharmaceutical companies are also permitted to give HCOs certain types of donations, grants and benefits in kind, to assist with medical education and practice.

As part of a Europe-wide pharmaceutical industry move towards greater transparency, Disclosure UK is an industry-led initiative to deliver a searchable public database that shows payments and benefits in kind made by the pharmaceutical industry to HCPs and HCOs. Under this initiative, companies are required to publically disclose certain such payments made directly or indirectly to HCPs and HCOs in the previous year. Payment disclosures in relation to clinical trials are anonymised in relation to payees. For all other qualifying payments, the aim is to publicly disclose these on a named individual HCP or HCO basis. This principle of open disclosure is also consistent with HCP's Codes of Conduct as well as NHS guidance seeking to ensure that staff who are subject to the transparency initiatives of Disclosure UK are aware of and comply with it.

2. What types of payment has Dermal made to HCPs and HCOs during 2019?

No payments regarding Joint Working have been made by Dermal in 2019.

A number of payments have been made by Dermal during 2019 with regards to medical education events, which includes the following:

Donations or sponsorship agreements for Healthcare Organisations relating to the organisation of educational events.

Contributions towards the costs of attending educational events, including Registration Fees, Travel and Accommodation.

Payments for Consultancy Fees, such as Speaker Fees and related expenses at educational events and for Company Medical Advisor and new product development advice.

Payments for clinical trial activities.

Each column contains data relating to the type of payment made.

The payments listed were made in Sterling, and represent the payments made for services provided during 2019 to the individual or organisation within the UK. Where appropriate, VAT is included within the listed payment quantity.

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3. How did Dermal manage HCP/HCO payments and consultancy agreements?

For the year of 2019, the appropriate HCPs/HCOs were required, in liaison with Dermal, to sub-divide into the specified categories any relevant payments made directly or indirectly to them in relation to the activity/service involved. For example, in the case of HCPs attending events/conferences, their registration fees were itemised separately from any agreed travel and accommodation payments, and for HCPs providing a consultancy service separate accounts were agreed for professional fees and agreed related expenses. The purpose(s) of any consultancy service was set out in a suitable written agreement including an obligation for the consultant to declare they are a consultant for Dermal whenever they write or speak in public about any issue relating to Dermal. These agreements also made it clear that Dermal is prohibited from incentivising or rewarding HCPs for their past, present or future use or support of a medicine or from influencing the outcome of any clinical trial(s) or for any other improper purpose.

4. When and how was the HCPs'/HCOs' written informed consent requested prior to public disclosure of payments?

This was asked for when the contribution towards costs, or fee for services or consultancy was commissioned by Dermal, and a written agreement was signed. Whilst 'open' disclosure is encouraged in the spirit of transparency, individuals were free to decide whether or not they wish to give their consent to named disclosure.

As part of the pharmaceutical industry's annual disclosure of transfers of value to HCPs, ORDMs and HCOs via the Disclosure UK platform and in order to ensure accuracy of the published data, the ABPI writes to all of the HCPs, ORDMs and HCOs named in companies' disclosure data ahead of its publication on Disclosure UK at the end of June. (Over 20,000 in June 2019.)

Given the unprecedented pressure on the NHS and health care professionals in responding to the COVID-19 pandemic, in April 2020 the ABPI and PMCPA agreed that it would not be appropriate for industry to write to HCPs, ORDMs or HCOs to request that disclosure data be reviewed in Q2 2020. Doing so would add additional work for NHS professionals at this time. To avoid this, and in-line with guidance provided by the ABPI, Dermal's 2019 transfer of value data was published on Disclosure UK in aggregate in April 2020. In July 2020, the disaggregated information was uploaded, pending a decision as to when it will be appropriate for industry to write to HCPs, ORDMs or HCOs.

The information disclosed will remain publicly accessible for at least three years from the date of disclosure, and each pharmaceutical company will be required to keep their detailed records of such payments for at least 5 years after the year to which they relate.

5. Data Protection

Personal information is managed in accordance with the requirements of the General Data Protection Regulation (Regulation (EU) 2016/679) and the Data Protection Act 1998.

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