

## **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**

### **Disclosure of 2019 data during the COVID-19 pandemic in 2020**

Britannia Pharmaceutical's 2019 transfer of value data has been previously published on Disclosure UK in aggregate form as directed by the ABPI and PMCPA.

### **General Summary of 2019 Disclosure**

This disclosure submission includes those payments and ToVs that are subject to Britannia disclosure obligations covering the period 1 January 2019 to 31 December 2019. 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.

### **Package Deals**

Package deals are commercial arrangements whereby the purchase of a particular medicine is linked to the provision of certain associated benefits such as apparatus for administration, the provision of training on its use or the service of a nurse to administer it. Britannia offers the NHS a package deal in the form of their Nurse Advisors in APO-go therapy.

### **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 January/February 2020 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.

### **Package Deal Payments**

A number of nurses and healthcare assistants, who form part of the Britannia Nurses Advisors in APO-go therapy service, are contacted staff from a third party HCO, namely IQVIA Equivalent NHS salaries, according to banding, are disclosed as an aggregate ToV under 'Donations and Grants to HCOs (Art. 3.01.1.a & Clause 24) and Benefits in Kind to HCOs (Clause 24)'

### **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 3<sup>rd</sup> 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.