

## **ABPI Disclosure Methodological Note 2021**

This note describes the methods used by Syri Limited in the UK to meet its obligations and the requirements for disclosing payments and Transfers of Value (ToV) to Healthcare Professionals (HCPs), Other Relevant Decision Makers (ORDMs) and Healthcare Organisations (HCOs) as outlined in the PMCPA Code of Practice for the Pharmaceutical Industry.

### **Definitions**

#### **Transfer of Value (ToV)**

The term transfer of value means a direct or indirect ToV, whether in cash, in kind or otherwise, made for promotional purposes or otherwise, in connection with the sale or development of licensed medicines.

#### **Healthcare Professional (HCP)**

HCP's include members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their activities may administer, prescribe, purchase, recommend or supply a medicine.

#### **Healthcare Organisation (HCO)**

HCO 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 place of incorporation or primary place of operation is in Europe or an organisation through which one or more HCPs or other relevant decision makers provide services.

#### **Other Relevant Decision Maker (ORDM)**

ORDMs particularly include 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 HCPs.

## **Data included**

In 2020 Syri Limited made payments of ToVs to HCPs for the provision of a service (e.g. consultancy / advisory board fees).

## **Other Considerations**

### **VAT**

VAT is not included in the payments.

### **Currency**

Transfer of values were only made in pound sterling (GBP) in 2020.

### **Cross Border Payments**

No cross-border payments were made in 2020.

### **Multi-Year Contracts**

There were no multi-year contracts in 2020.

### **Indirect Transfers**

No indirect transfers were made in 2020.

### **Over-the-Counter & Medical Device Transfer of Values**

No transfer of values was made for over-the-counter or medical devices in 2020.

### **Management of consent for disclosure**

In line with the requirements of the Data Protection Laws in the UK, Syri Limited will only make disclosure of an individual HCP's or ORDM's personal data to the ABPI with the prior written consent of the HCP/ORDM concerned.

Syri Limited seeks consent by asking those HCPs engaged by the company to consider signing and returning a statement allowing for public disclosure. Once returned to Syri Limited the consent is held electronically for at least 3 calendar years unless such HCP/ORDM notifies the company of their wish to subsequently withdraw their consent during this time.

Each HCP/ORDM is entitled to withdraw their consent to disclosure at any time. In such cases, HCPs and ORDMs are asked to send an e-mail to Syri Limited notifying the company that they wish to withdraw their consent prior to publication. Following publication of Syri's ToV data, HCPs and ORDMs are also able to contact the ABPI to withdraw their consent.

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