

Methodological Note to 2020 Disclosure Report for Besins Healthcare (UK) Limited

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LIST OF ABBREVIATIONS

ABPI	Association of the British Pharmaceutical Industry
BHUK	Besins Healthcare (UK) Limited
BIK	Benefits in kind CCGs Clinical Commissioning Groups
EFPIA	European Federation of Pharmaceutical Industries and Associations
GDPR	General Data Protection Regulation
GP	General practitioner
HCO	Healthcare organisation
HCP	Healthcare professional
ORDM	Other relevant decision maker
TOV	Transfer of value

INTRODUCTIONS

Besins Healthcare UK Limited (BHUK) is committed to transparent interactions with Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs).

HCPs and HCOs offer expert knowledge on patients' behavior and management of diseases and are the primary point of contact with patients. This plays a valuable role in informing BHUKs efforts to improve patient care – which is essential to improving patient outcomes. BHUK compensate HCPs and HCOs for the valuable insights and time they offer and also provide funding for medical education either directly to HCPs, via HCOs or third-party specialist providers.

BHUK is committed to making the transfers of value made to HCPs and HCOs transparent and in doing so all reasonable efforts will go into making sure they are accurate, valid and complete. BHUK complies with all laws, rules and regulations. Laws in the EU protect the rights of citizens in relation to the way their personal data is processed. HCPs are covered by Data Privacy laws and this affects the way in which BHUK can publish the HCP's transfers of value. BHUK will seek permission (consent) from the HCP to individually publish their transfers of value and as such HCPs have the right to opt out of individual disclosure.

BHUK is committed to disclosing all TOV to HCPs and HCOs in accordance with its commitment to the ABPI Code of Practice in alignment with the European Federation of Pharmaceutical Industries and Associations (EFPIA) Code on Disclosure on Transfers of Value.

All required TOVs made in the UK from January 1st 2020 to December 31st 2020 are disclosed on the ABPI central platform.

This document summarises the approach taken by BHUK in calculating the figures provided and considers;

[1] ABPI Code of Practice for the Pharmaceutical Industry 2019. Available from:

<https://www.abpi.org.uk/publications/code-of-practice-for-the-pharmaceutical-industry-2019/>

[2] EFPIA Code of practice 2019. Available from:

<https://www.efpia.eu/relationships-code/disclosure-of-payments-to-hcps/>

[3] PMCPA Disclosure-Methodological Notes points for consideration. Available from;

<https://www.pmcpa.org.uk/guidance-and-qas/guidance/disclosure-methodological-notes-points-for-consideration/>

DEFINITIONS

Transfer of Value (ToV)

The term 'transfer of value' (TOV) means a direct or indirect transfer of value, whether in cash, in kind or otherwise, in connection with the development or sale of medicines. A direct transfer of value is one made directly by a company for the benefit of a recipient. An indirect transfer of value is one made by a third party on behalf of a company for the benefit of a recipient where the identity of the company is known to, or can be identified by, the recipient (Clause 1.10)¹.

Healthcare professionals (HCPs) are defined as 'members of the medical, dental, pharmacy and nursing professions and any other persons who in the course of their professional activities may administer, prescribe, purchase, recommend or supply a medicine (Clause 1.4)¹.

Healthcare Organisation (HCO)

A healthcare organisation (HCO) is 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 healthcare professionals or other relevant decision makers provide services (Clause 1.9)¹.

Other Relevant Decision Maker (ORDM)

The term 'other relevant decision maker' (ORDM) 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 health professionals (Clause 1.5)²

HOW WAS THE DISCLOSURE ORGANISED?

Data were collected, reconciled, and reported on the BHUK disclosure template. This tracker is used by BHUK to track payments to HCPs, ORDMs and HCOs within all EFPIA member countries.

All financial TOVs were reconciled against the contractual agreements, the tracker recordings and the actual payments made.

DISCLOSURE CATEGORIES

Sponsorship of HCPs/ORDMs to attend medical meetings.

Costs declared include registration fees, travel and accommodation. Costs related to subsistence (food) are not declared but the meal costs are regulated by strict industry guidelines.

Fee for Service and Consultancy, and associated related expenses agreed in the fee for service agreement

This includes the following services: Speaker and Chairperson fees, Consultancy fees and Training. Where the TOV was provided as a fee for service, the TOV has been calculated based on the fair market value rate for the service provided.

Contributions towards the costs of meetings organised by HCOs

BHUK discloses all payments made to medical associations, healthcare organisations, etc in relation to meetings. This includes direct funding such as sponsorship fees and fees paid to erect an exhibition stand, and indirect support such as providing a logistics agency or subsidising the cost of registration fees.

Donations, Grants and Benefits in Kind (BIK) to HCOs

Donations and Grants to HCOs that support healthcare, including donations and grants to institutions, organisations or associations that are comprised of HCPs and/or that provide healthcare. For financial grants the date of TOV has been recoded as the date the payment was processed by BHUK.

Note: The cost of any sponsorship related directly to food is outside the scope of disclosure. All costs associated with meetings run solely by BHUK are outside the scope of disclosure except for fees paid to individual HCPs providing services as speakers, etc.

Joint working

BHUK is not involved with any joint working projects with HCOs.

Research and development

All payments to HCPs and HCOs related to research and development are disclosed as an aggregate figure in accordance with the ABPI Code of Practice.

Patient organisations

There are no disclosures in scope of this category in 2020.

OTHER CONSIDERATIONS

Cross border payments

All disclosures are made in the country in which the HCP or HCO practice is located. Payments made to a UK-based HCP or organisation by Besin entities located in other countries are disclosed within the UK, regardless of the source of funding.

Multi-year contracts

There are no multi-year contracts.

Over the counter medicines and medical devices

There are no disclosures in scope of this category for 2020.

VAT

Where payments were made and VAT was applicable, the VAT has been excluded for the purposes of disclosure. Therefore, all values provided are exclusive of VAT. There are no other tax considerations.

Exchange rate and currencies

The amounts disclosed are those actually paid by BHUK. They may differ slightly from the amounts received by the HCP/HCO as they do not take into consideration any exchange fees or other fees applied by the recipient's bank.

On occasions payments are made in a currency other than UK sterling. In these situations, the exchange rate will mean the exact equivalent in sterling according to the date on which the conversion calculation was made. All disclosures will be displayed in UK sterling. The UK sterling totals will be calculated using the exchange rate on the day of payment using Currency Exchange Rates-International at [\(\)](#). Readers should understand that the total amounts disclosed in sterling could therefore vary slightly from the exact amount paid in the local currency; variations will be greater if there have been significant movements in exchange rate during the reporting period.

Time of payment

The date recorded for the TOV is the date payment was processed by BHUK.

Consent for disclosure and GDPR

In accordance with Data Privacy law, BHUK has obtained and retained records of consent from HCPs on an individual activity basis prior to disclosing personal data such as individual transfers of value. Where permission has not been obtained or where HCPs have refused consent, BHUK has declared the total spend as an aggregate figure given on a separate line entry within the relevant disclosure category and the % of non-consenting HCPs given as a percentage of the total HCPs receiving a ToV.

As set out in the disclosure template for the 2020 data, 12 individuals agree to the disclosure of Transfers of Value being made to them, for fees for service, being disclosed individually. 8 individuals do not provide their consent or withdraw their consent and in such cases, the Transfers of Value are made to them on an aggregate basis with respect to this category and that does not identify them.

CONTACTS

For other enquiries related to the information in either this Methodological Note or the 2020 Disclosure Report please contact: information@besins-healthcare.com.