

Methodological Note

Britannia Pharmaceuticals Ltd have the following processes in place to ensure that the information collected is accurate and prepared prior to submission.

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

POs - 'Patient organisation' means an organisation mainly comprising of patients and/or caregivers or any user organisation such as a disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers.

Consent

- Consent is requested for each activity; it is requested using an electronic consent preference form once the HCP has agreed to provide a service.
- The consent form is stored electronically on the HCPs record on a password protected internal system designed to manage and record TOVs. The HCPs consent preference is recorded within the electronic system and the consent preference form is uploaded as evidence of consent.
- If an HCP provides partial consent, this interaction with consent granted will be disclosed.
- If an HCP declines to provide consent any transfers of value made to that HCP will be disclosed within the aggregate.
- As the electronic system was introduced in 2021, any interactions initiated prior to the launch of the system were contacted by email in March 2022 to request consent. If consent was not granted the transfer of value has been included in the aggregate.

Data Collection

- An internal electronic system is used to track consent and transfers of value made to HCPs, ORDMs and HCOs.
- Consent preference and details of payments are recorded against the HCO or HCP record card. HCPs that decline to provide consent are automatically added to the aggregate, for those that consent, the consent preference form is uploaded as evidence of consent.
- The data collated on the electronic system is double checked against the financial records. Finance provides a record of all payments made to HCPs/ORDMs and HCOs, this data is used to check the electronic system and highlight any discrepancies.

Data Privacy

A statement around consent is included within our standard contracts and payment request forms, our consent form, which is based on the ABPI template, includes a direct email address should the HCP wish to discuss Britannia's data privacy policies further.

For those HCPs who were emailed to gain consent, we included direct links to our data privacy policies and our website within the email.

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.

Transactions

All transactions are disclosed in pound sterling; an appropriate average annual exchange rate has been used to translate into a sterling equivalent and this has been provided by our finance team.

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.

Donations, Grants and Sponsorship

Any payment made to HCPs, HCOs and POs 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 3rd 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.