

Methodological Notes

The pharmaceutical industry in the United Kingdom is committed to benefiting patients by operating in a professional, ethical and transparent manner to ensure the appropriate use of medicines and support the provision of high quality healthcare. The ABPI (Association of the British Pharmaceutical Industry) code covers the promotion of medicines for prescribing to both health professionals and other relevant decision makers. It also includes requirements for interactions with health professionals. In addition, it sets standards for the provision of information about prescription only medicines to the public and patients, including patient organisations. In addition to the Code there is extensive UK and European law relating to the promotion of medicines. The Code reflects and extends beyond the relevant UK law.

The ABPI Code of Practice requires the public disclosure in 2016 of certain transfers of value made during 2015 to UK health professionals and health care organisations. In cases where permission to disclose transfers of value is refused by individual health professionals, the transfer of value made to them is disclosed in an aggregated format. The disclosure data will be published on a central platform, hosted by the ABPI and made available to anyone who requests access. The ABPI Code requirements on disclosure are predominantly set out in Clause 24, however information can also be found in Clauses 1, 19, 20, 21, 22 and 23.

The methodological notes below explain the data Dr Falk Pharma UK Limited has disclosed and how the data has been prepared.

VAT

VAT is excluded from all disclosures of transfer of value.

Currency

All disclosures are made in pounds sterling (£). Where the original payment was made in another currency, the value was converted to pounds at the exchange rate prevailing at the time of the original payment.

Data included

The data disclosed by Dr Falk Pharma UK Limited is consistent with the requirements of the ABPI Code of Practice. The data can be categorised as follows:

Sponsorship of health professionals to attend educational events

The data includes all travel costs and accommodation costs, but does not include food and drink costs. The data also includes the registration fee, where applicable, for the health professional to be registered to attend the educational event.

Payment of consultants who provide services to Dr Falk Pharma UK Ltd

The data includes the payment of honoraria to UK health professionals who provided services to Dr Falk Pharma UK Ltd during 2015. Where applicable, the data also includes payment of reasonable expenses to such consultants in the delivery of their services, such as travel expenses or accommodation expenses.

Donations, grants and benefits to health care organisations & patient groups

The data includes transfers of value to UK health care organisations such as the provision of meeting organisation services by Dr Falk Pharma UK Limited or payment to support educational meetings or projects that enhance patient care or benefit the NHS and maintain patient care. Support was declared on materials relating to the specific event or programme.

Disclosure by Dr Falk Pharma UK Limited of payments to UK health professionals and health care organisations in 2015:-

Data Privacy/GDPR and Consent

Revised data protection under the new GDPR requires that Dr Falk Pharma UK Ltd obtain express permission from individual HCPs prior to disclosing personal data, such as individual transfers of value. Since the new law applies retrospectively to all data, Dr Falk Pharma UK Ltd has decided to treat all personal data as confidential until such time as consent can be unambiguous. Dr Falk has therefore declared the total spend as an aggregate figure as a separate line entry within the relevant disclosure category.

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs)								
			Contribution to costs of Events (Art. 3.01.1.b & 3.01.2.a & Clause 24)			Fee for service and consultancy (Art. 3.01.1.c & 3.01.2.c & Clause 24)		
			Donations and Grants to HCOs (Art. 3.01.1.a & Clause 24) and Benefits in Kind to HCOs (Clause 24)	Sponsorship agreements with HCOs / third parties appointed by HCOs to manage an Event	Registration Fees	Travel & Accommodation	Fees	Related expenses agreed in the fee for service or consultancy contract
AGGREGATE	HCPs	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.2, EFPIA Template & Clause 24			£2,585.25	£42,677.00	£43,257.30	£383.52
		Number of Recipients in aggregate disclosure - Art. 3.2, EFPIA Template & Clause 24			240			
	HCOs	Aggregate amount attributable to transfers of value to such Recipients - Art. 3.2, EFPIA Template & Clause 24	£35,871.80					
		Number of Recipients in aggregate disclosure - Art. 3.2, EFPIA Template & Clause 24	2					