

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 of certain transfers of value made during a given year to health professionals and health care organisations.

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 disclosures of transfer of value.

Currency

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 disclosure data will be published on a central platform, hosted by the ABPI and made available on the Dr Falk UK website. 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 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 health professionals who provided services to Dr Falk Pharma UK Ltd. in the past year. 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.

Payments to charity and HCO as fees

On occasion, an HCP who has provided a service to Dr Falk Pharma UK Ltd may ask for their fee to be paid to charity or to the HCO where they are employed. On these occasions, the fee received by the HCP will be disclosed under that HCP's entry.

Payments to non-UK HCPs or HCOs

Dr Falk Pharma UK Ltd operate in both the UK and Ireland. As such, some transfers of value are made to organisations and individuals based outside the UK. All disclosures made by Dr Falk Pharma UK Ltd are declared here.

Patient Organisations

Patient organisations are providers of essential support and information to those living with medical conditions, as well as their families and carers. Working with these valued organisations allows Dr Falk Pharma UK Ltd to support their efforts with vital resources. All transfers of value to UK-based patient organisations are disclosed.

Data Privacy and Consent

Data Privacy law requires that Dr Falk Pharma UK Ltd obtain express permission from individual HCPs prior to disclosing personal data such as individual transfers of value. Dr Falk Pharma UK Ltd has made every effort to secure and retain a record of the necessary permissions. Where permission has not been obtained or where the individual HCP has refused permission, Dr Falk has declared the total spend as an aggregate figure as a separate line entry within the relevant disclosure category.

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

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 - <i>Art. 3.2, EFPIA Template & Clause 24</i>			£9,558.37	£75,247.13	£79,230.13	£9,565.30
		Number of Recipients in aggregate disclosure - <i>Art. 3.2, EFPIA Template & Clause 24</i>			210			
	HCOs	Aggregate amount attributable to transfers of value to such Recipients - <i>Art. 3.2, EFPIA Template & Clause 24</i>	£56,050.00					
		Number of Recipients in aggregate disclosure - <i>Art. 3.2, EFPIA Template & Clause 24</i>	5					