

DISCLOSURE OF PAYMENTS TO HEALTHCARE PROFESSIONALS (HCPs), OTHER RELEVANT DECISION MAKERS (ORDMs) AND HEALTHCARE ORGANISATIONS (HCOs)

Article 2 - Section 2.03 & Schedule 2 & Clause 24

Date of publication: .....

Main table header with columns: Full Name, HCPs/ORDMs: City of Principal Practice, Country of Principal Practice, Principal Practice Address, Unique country local identifier, Joint Working, Donations and Grants to HCOs, Contribution to costs of Events, Fee for service and consultancy, and two Blank Columns for Clause X, and a TOTAL column.

INDIVIDUAL NAMED DISCLOSURE - one line per HCP/ORDM (i.e. all transfers of value during a year for an individual HCP will be summed up; itemization should be available for the individual recipient or public authorities' consultation only, as appropriate)

Table listing individual HCPs and ORDMs with columns for Title, First Name, Initial, Last Name, Speciality, Role, HCPs/ORDMs: City of Principal Practice, Country of Principal Practice, Institution Name, Location, Address Line 1, Address Line 2, Post Code, Email, Local Register ID or Third Party Database ID, and various payment categories.

Summary rows for aggregate amounts and percentages, including 'Aggregate amount attributable to transfers of value to such Recipients' and 'Number of Recipients in aggregate disclosure'.

Table for HCOs (Clause 24) with columns for Institution Name, Location, Address Line 1, Address Line 2, Post Code, Email, Local Register ID or Third Party Database ID, and various payment categories.

Summary rows for aggregate amounts and percentages for HCOs, including 'Aggregate amount attributable to transfers of value to such Recipients'.

AGGREGATE DISCLOSURE (Clause X) section with a table for 'Transfers of Value re: Research & Development as defined (Art 3.04 & Clause 23.2)'.

- NOTE 1: 'Art.' refers to the relevant Article of the 2014 EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations
NOTE 2: 'Clause' refers to the relevant Clause of the 2019 ABPI Code of Practice for the Pharmaceutical Industry.
NOTE 3: Unique ID would be a database identifier either Binleys or OneKey. This can be left blank.
NOTE 4: Payments to health professionals (HCPs) as defined in Clause 1.4, healthcare organisations (HCOs) as defined in Clause 1.9 and the relevant decision makers (ORDMs) as defined in Clause 1.5, has to be disclosed.
NOTE A: Data relates to the column heading ie registration fees
NOTE B: Data relates to the column heading ie travel and accommodation
NOTE C: Data relates to column heading ie fees for service
NOTE D: Data relates to the column heading ie related expenses agreed in the fee for service or consultancy contract
NOTE E: Total E disclosed as aggregate
NOTE F: Total number of individuals disclosing in aggregate. WARNING: this is not necessarily a sum of columns V,W,X and Y as individuals might appear in more than one category i.e. receive fees and expenses.
NOTE G: The link can be included here and/or in the methodological note
NOTE H: The methodological note must make clear the number of individuals who have agreed to some payments being disclosed individually and some in aggregate
NOTE J: Total E for that individual
NOTE K: Total E for that HCO across all activities except R&D

Legend table with three rows: 'required' (red background), 'optional' (blue background), and 'to facilitate the process but not to be published on database' (yellow background).