

PMCPA

Prescription Medicines
Code of Practice Authority

Global Transparency Regulatory Update

UK Update

Pharmaceutical Compliance Congress and Best Practice Forum

Monday, 5 May 2014

Heather Simmonds

Director

Prescription Medicines Code of Practice Authority

www.pmcpa.org.uk



CODE OF PRACTICE
for the
PHARMACEUTICAL
INDUSTRY

2014

PMICPA

Prescription Medicines
Code of Practice Authority

Confidential

Not for Publication

**CODE OF
SALES PROMOTION PRACTICE
FOR
MEDICAL SPECIALITIES
IN THE UNITED KINGDOM**

October, 1958

**THE ASSOCIATION OF BRITISH PHARMACEUTICAL
INDUSTRY**

**Tavistock House South
Tavistock Square
London W.C.1
EUSton 2531/3**

History of Disclosure of Certain Payments

Aggregate disclosure introduced in 2011 Code for disclosure of certain 2012 payments.

Additional requirements for 2013 payments.

EFPIA HCP/HCO DISCLOSURE CODE

EFPIA CODE ON DISCLOSURE OF TRANSFERS OF VALUE FROM PHARMACEUTICAL COMPANIES TO HEALTHCARE PROFESSIONALS AND HEALTHCARE ORGANISATIONS

Adopted by the EFPIA Statutory General Assembly of 24 June 2013, and
requiring implementation in national codes by 31 December 2013

FINAL EDITED VERSION
Following General Assembly Approval

2014 ABPI Code

1 January 2014

EFPIA HCP/HCO Disclosure Code

Plus other updates

Payments for certain services to be disclosed on an individual named basis

2015 payments to be disclosed in 2016

Data privacy law? Competition law?

Aggregate payments for research and development

Template for disclosure?

Central platform?

- Key decision points:
 1. Host organisation
 2. Funding model
 3. How data is made available to users
- The HCP perspective
- The company perspective

Next versions of the ABPI Code


1 January 2015


EFPIA HCP/HO Disclosure Code – method of disclosure

ABPI Board Review

Usual update

ANNUALLY FROM:	2013	2014	2015	2016	NOTES
Clause 18.5 Payments made in connection with joint working			Collect financial amount/value and name of recipient	Disclose by 30 June the previous year's data regardless of whether the value is transferred to healthcare organisation or some other funding model is used	Refer to notes for Clause 21 below. Executive summary must be published before arrangements are implemented.
Clause 18.6 Donations/grants/benefits in kind to institutions, organisations, associations which are comprised of health professionals and/or provide healthcare or conduct research	Disclose within 3 calendar months of the end of the company's financial year, details of donations and grants made in the previous year, to include financial amount/value and the name of recipient organisation. All reasonable steps should be taken to collect data from overseas affiliates etc		Collect details of benefits in kind in addition to grants and donations	Disclose details of grants, donations and benefits in kind by 30 June each year. Fees and expenses should be disclosed separately.	Refer to notes for Clause 21 below. Companies are encouraged to ask recipients to make such funding public.
Clause 18.7 Fees for service paid to institutions, organisations, associations for services or any other type of funding by companies not otherwise covered by the Code			Collect data including financial amount/value and recipient institution, organisation or association	Disclose details by 30 June. Fees and expenses should be disclosed separately.	Refer to notes for Clause 21 below.
Clause 19.4 Sponsorship of health professionals or administrative staff to attend 3rd party meetings	Disclose within 3 calendar months of the end of the company's financial year total aggregate amount paid in the previous year for registration fees (whether paid by UK company or overseas affiliate etc), accommodation and overseas travel, the total number of recipients and the total number of attendances. Include best estimate of accommodation and travel costs paid by overseas affiliates etc		Disclose 2014 data according to second 2012 Edition of the Code. Collect 2015 data according to Clause 19.5 of 2014 Code (see below)	Go to Clause 19.5 of 2014 Code.	Refer to notes for Clause 21 below. In 2015 the requirements change such that from then on data will have to be collected for all meetings and each recipient named.

 See Second Edition of 2012 Code for details

 See 2014 Code for details

NB. The term 'overseas affiliates etc' includes overseas affiliates, head offices in the UK or overseas and UK based European offices

Thank you