

Transparency roundtable

Methodological note and Consent
management - experience feedbacks

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Agenda

The methodological note – *Considerations*

Consent gathering strategy – *Discussion points*

Analyze and know your data

EFPIA Disclosure Code

The methodological note

Art. 3.05 – Methodology

*“Each Member Company shall publish a note summarizing the methodologies used by it in **preparing the disclosures and identifying Transfers of Value** for each category described in Section 3.01.”*

General recommendations

“The note, including a general summary and/or country specific considerations, shall describe the recognition methodologies applied, and should include the treatment of multi-year contracts, VAT and other tax aspects, currency aspects and other issues related to the timing and amount of Transfers of Value for purposes of this Code, as applicable.”



It is the minimum standard to comply with



Do not under-estimate its complexity and outreach

Methodological note

Implementation & Consideration

« **Good practice** » to
build the note

- ▶ **Public and general interest** are the ultimate transparency objective
- ▶ **Adequately structured for external understanding** and large audience
... whilst sufficiently **detailed for internal company identification of set of assumptions**
- ▶ Gather, document, understand and analyze all project sub-decisions for internal purpose
- ▶ **Start early** its conception
- ▶ “Follow the Money”, clearly, but not only
- ▶ Make tone at the top commitment to Compliance & Ethics positioning statement
- ▶ Involve Public Affairs for communication strategy

Consent Strategy (1/2)

Consider the HCP/HCO Consent Management Journey and interaction with your company as a key acceptance element of disclosure

Consent content and position	Ownership, content, wording
Governance	Detailed allocation of responsibilities between region and markets in end-to-end process
Collection	Who : Sales force, head-office, third-party When : Proactive (1st interaction, 1st TOV, every TOV) One-off campaign vs. Reactive (before 1st Disclosure), or a Mix How : electronic, paper, mix
Storage	Where (unique web-based tool, central repository, decentralized repository, specific systems, etc ...)
Management	(Opt-in, Opt-out, impacts, dispute)
Display & visibility (internal, external)	
Technical solution	
Deployment & process, training	

Consent Strategy - Other implications (2/2)

**Not to forget
implications of consent
management to other
work streams**

- ▶ Right to access and revocation rights
- ▶ Cross-border TOV's and subsequent processes
- ▶ Differentiate approaches between :
 - ▶ Third parties acting on their own name and own behalf
 - ▶ Third parties through which indirect TOV from company is performed
- ▶ Retention schedules

Analyze & Know your disclosure

Disclosures will be second-guessed...

... If not leveraged externally by unexpected stakeholders.
Understand what you are disclosing prior to make it public

- ▶ Analyzing and anticipate unusual trends or questions
- ▶ If available, benchmark/compare
- ▶ Leverage to demonstrate value to business leadership – Valuable source for internal Business Insights and decision-making
- ▶ Encompass disclosures into your analytics approach and compliance monitoring for the interactions w. HCPs/HCO's

“The beginning of a journey”, paving the way to enhanced industry reputation and upcoming potential compliance policies evolution

Thank you for your attention.



Building a better
working world