

2015 data for 2016 disclosure

Background

Clause 24.1 of the Association of the British Pharmaceutical Industry's Code of Practice (ABPI Code) states "*Companies must document and publicly disclose certain transfers of value made directly or indirectly to health professionals and healthcare organisations located in Europe*".

To this end, Clause 24.10 states that "*Each company providing transfers of value must publish a note summarising the methodologies used by it in preparing the disclosures and identifying each category of transfer of value.*"

This document sets out the methodology used by Sanofi Pasteur MSD (SPMSD) in the UK for recording Transfers of Value.

SPMSD format of recording Transfers of Value Raw Data in 2015

Transfers of Value data were manually captured and maintained in the form of an Excel spreadsheet (the "Transfers of Value Tracker" or TVT), specifying (as relevant):-

- Name of the Event
- Date of the Event
- Healthcare Professional's (HCP's) or Other Relevant Decision Maker's (ORDM's) name
- Name of the Healthcare Organisation (HCO)
- Category of Transfer of Value

Management of the SPMSD TVT

1. Data Capture

Each SPMSD UK functional area of the business was responsible for uploading the data in the TVT.

2. Data Review and Validation

All entries made into the TVT were reconciled by the finance team against the financial systems maintained by the Company where all transparency relevant vendors are flagged to easily identify coding to correct categories of spend.

SPMSD has disclosed Transfers of Value that were made to UK HCOs, HCPs and ORDMs during the period 1 January 2015 and 31 December 2015.

Where a UK HCP or ORDM was contracted prior to 2015 but actually received their Transfer of Value in 2015, the 2015 Disclosure report includes these Transfers of Value.

The completed TVT was subject to review and sign off by each Directorate Director, finally signed off by SPMSD UK Medical Director and data was then entered onto the ABPI approved spreadsheet.

3. Submission to ABPI

The completed SPMSD UK ABPI spreadsheet was submitted to the ABPI by 31st March 2016. Company records will be retained for 5 years after the end of the calendar years to which they relate.

Other relevant information

1. Payments were recorded in pounds sterling.
2. Payments made in Euros and other currencies by SPMSD entities outside of the UK that related to UK Transfers of Value (cross border payments) were converted to pounds sterling.
3. VAT was included where applicable to contracts.
4. Transfers of Value were made to a HCP/ORDM directly or to a relevant organisation directly. No Transfers of Value were made to a HCP/ORDM indirectly via an organisation.
5. Where consent to disclose was not provided, data has been provided in aggregated format.

Glossary of Terms

ABPI - Association of the British Pharmaceutical Industry

TVT- Transfer of Value Tracker

HCP – Healthcare Professional/Health Professional

ORDM – Other Relevant Decision Maker

HCO- Healthcare Organisation

SAP - Systems, Applications and Products in Data Processing software

ZINC – an electronic certification/approval system

Donation and Grants- a unilateral monetary or in-kind support, sometimes referred to as "Grants", including services rendered directly or indirectly by SPMSD, for educational, healthcare or charitable (i.e. non-commercial/non-profit) purposes and without the expectation of receiving something in return. If a service having any kind of tangible value is received by SPMSD in exchange (such as its own symposium, booth space, free event attendance, advertising), the arrangement shall be considered a Sponsorship and not a Donation. The proposed activity of the recipient of the Donation must be independent of input or control of SPMSD. Therefore, arrangements which require that SPMSD undertake any actions beyond the mere provision of monetary or in-kind support are not Donations; they should be considered as collaborative, service arrangements or Joint Working.

Sponsorship- is the funding of events organised by a third-party (institution, organisation or association) where SPMSD receives some services in exchange, such as its own symposium, booth space, free attendance, advertising that goes beyond the mere disclosure of SPMSD's financial support on the event's premises, website or related leaflets and publications.

References

- 2014 EFPIA Code on Disclosure of Transfers of Value from Pharmaceutical Companies to Healthcare Professionals and Healthcare Organisations
- 2016 ABPI Code of Practice for the Pharmaceutical Industry:-
 - health professionals (HCPs) are defined in Clause 1.4, other relevant decision makers (ORDMs in Clause 1.5, and healthcare organisations (HCOs) in Clause 1.9.
 - Clause 24.

- Clauses 24.3 and 27.7 (whereby transfers of value to patent organisations are disclosed separately).