Dissect the relationship between manufacturers and HCPs

Public disclosure: the answer to all our woes?

Andrew Powrie-Smith, ABPI

Unstoppable journey

Consulting in partnership with HCPs

- Support for public disclosure of payments
- Single searchable database
- Inclusion of other sectors
- Proactive role for health professionals

Ethical Standards in Health & Life Sciences Group

Establishing a register of payments received by UK healthcare professionals from commercial organisations

A consultation document

Members

ACADEMY OF MEDICAL ROYAL COLLEGES, abhi, abpi, BIVDA, BMA, Institute of Healthcare Management, NHS CONFEDERATION, RCGP, Royal College of Nursing, Royal College of Physicians, RCPE, RC PSYCH, RCS, Royal Society of Medicine

Observers

General Medical Council, PMCPA

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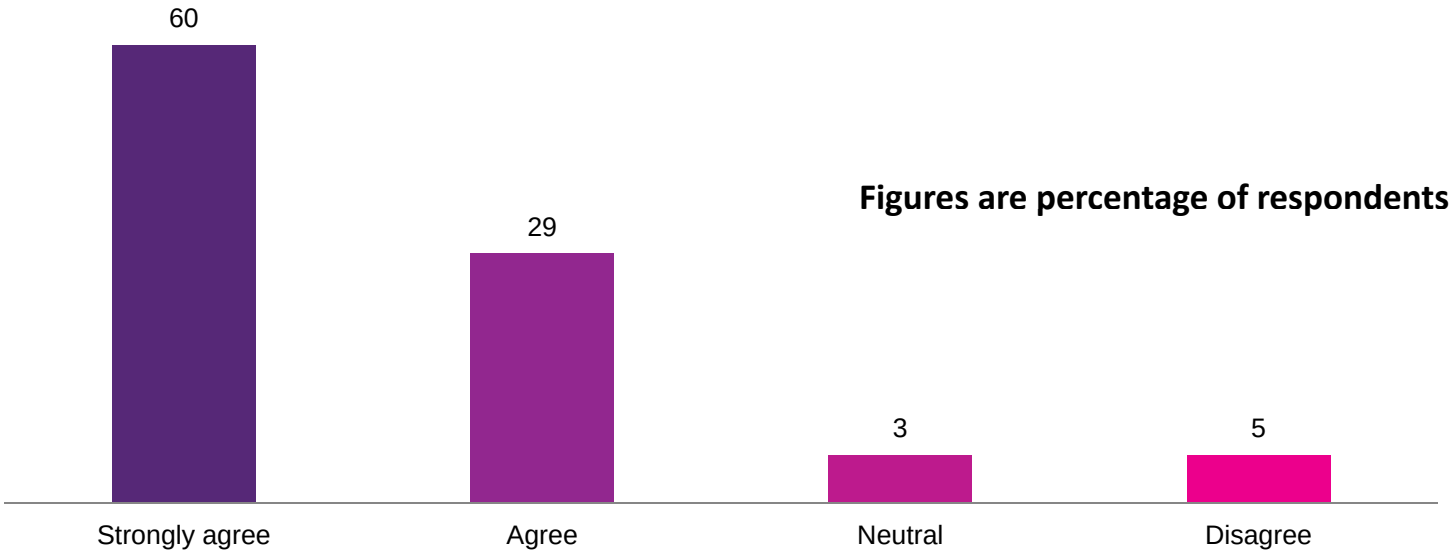
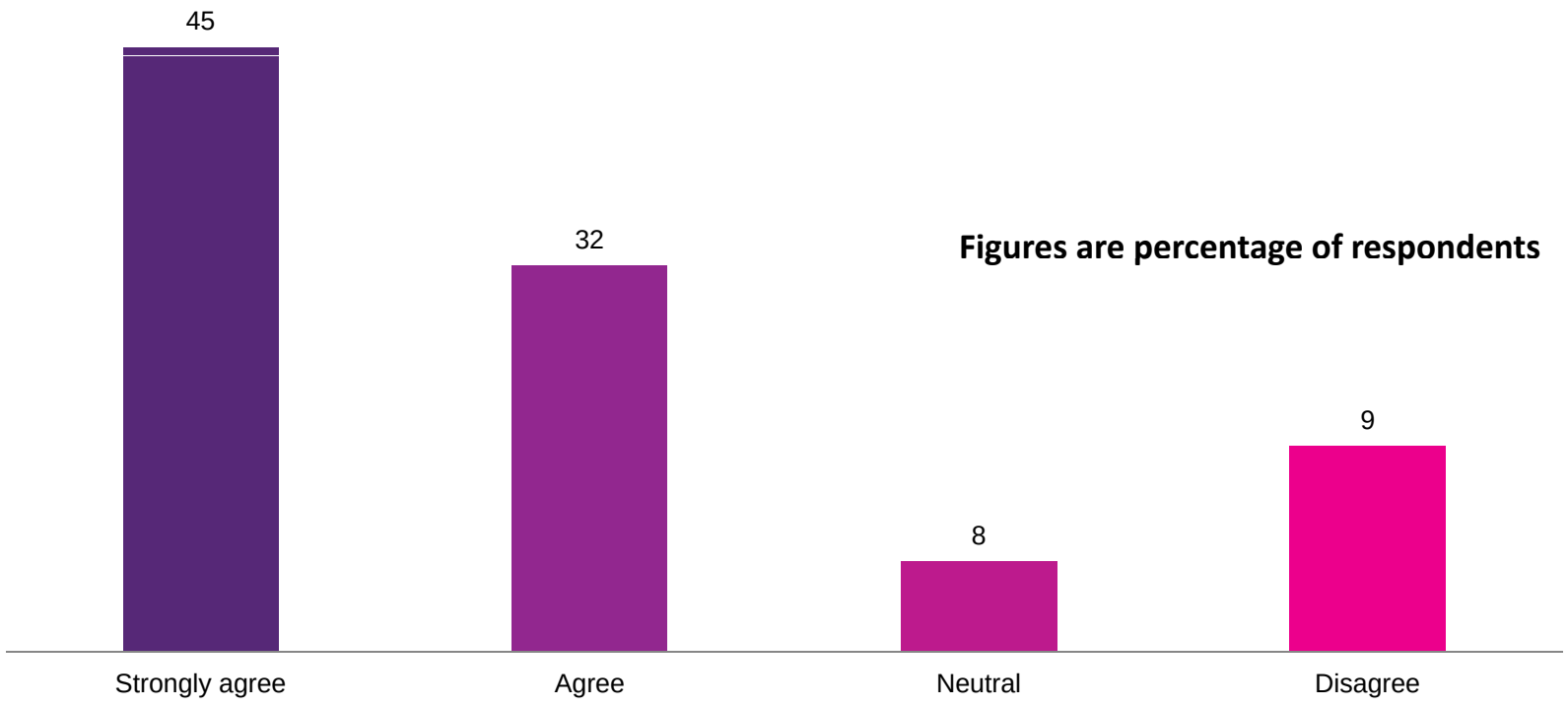
HCP consultation on individual disclosure

…..with the principle that payments from commercial organisations to individual health care professionals should be transparent



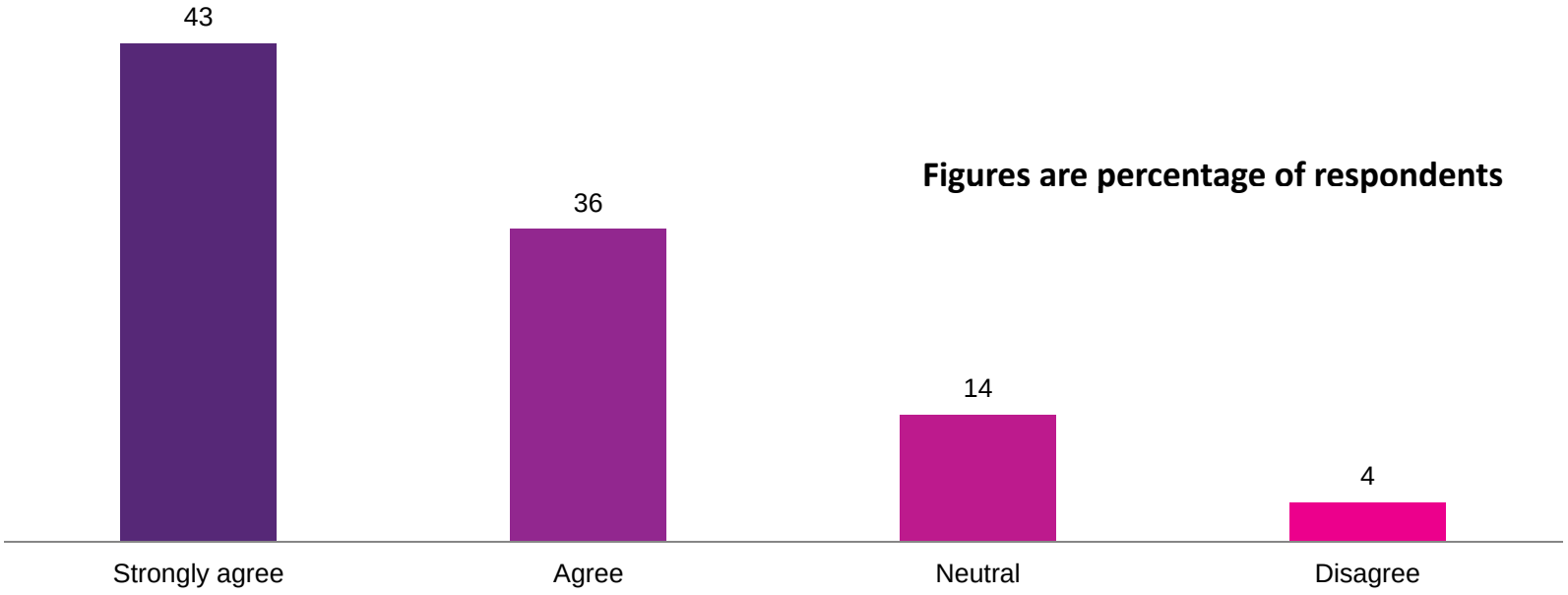
HCP consultation on individual disclosure

.....with the principle that payments from commercial organisations to individual health care professionals should be publically declared



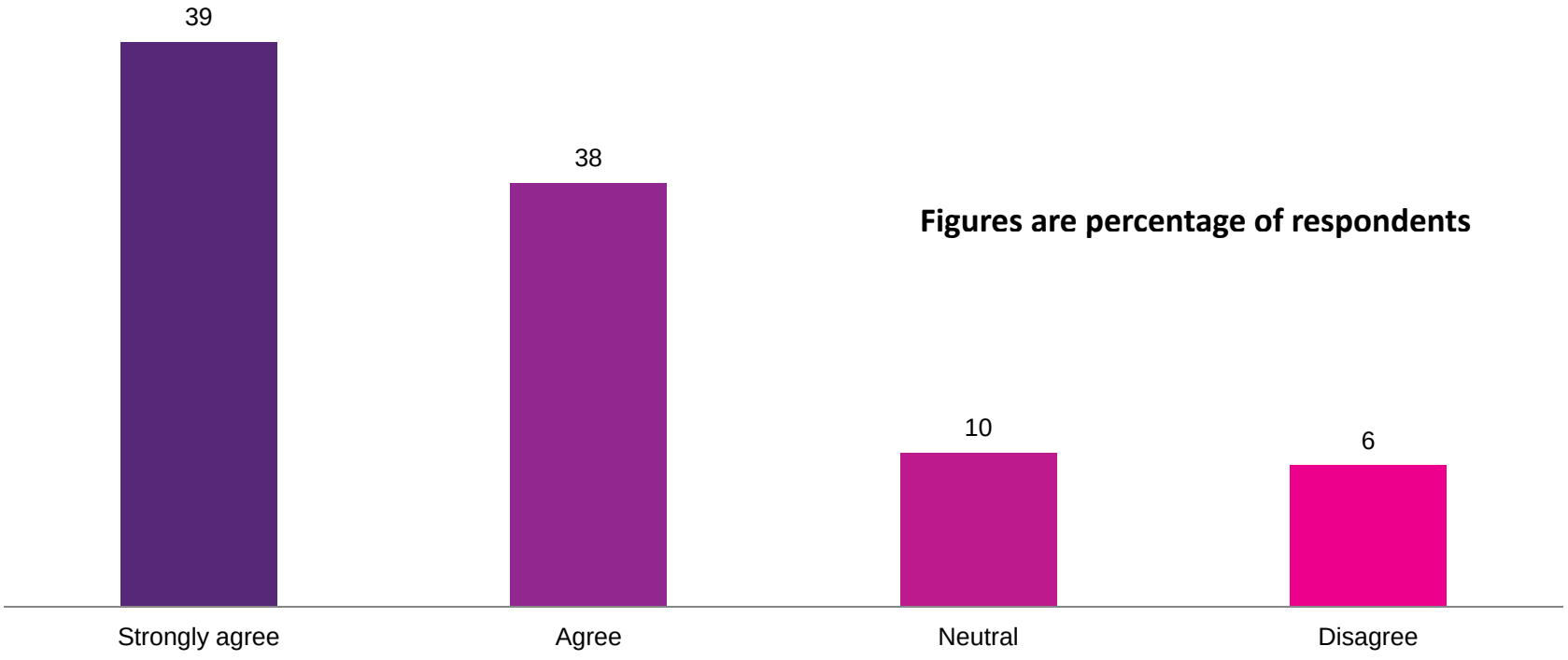
HCP consultation on individual disclosure

…..with that a system of disclosure should take the form of a publically searchable, single database



HCP consultation on individual disclosure

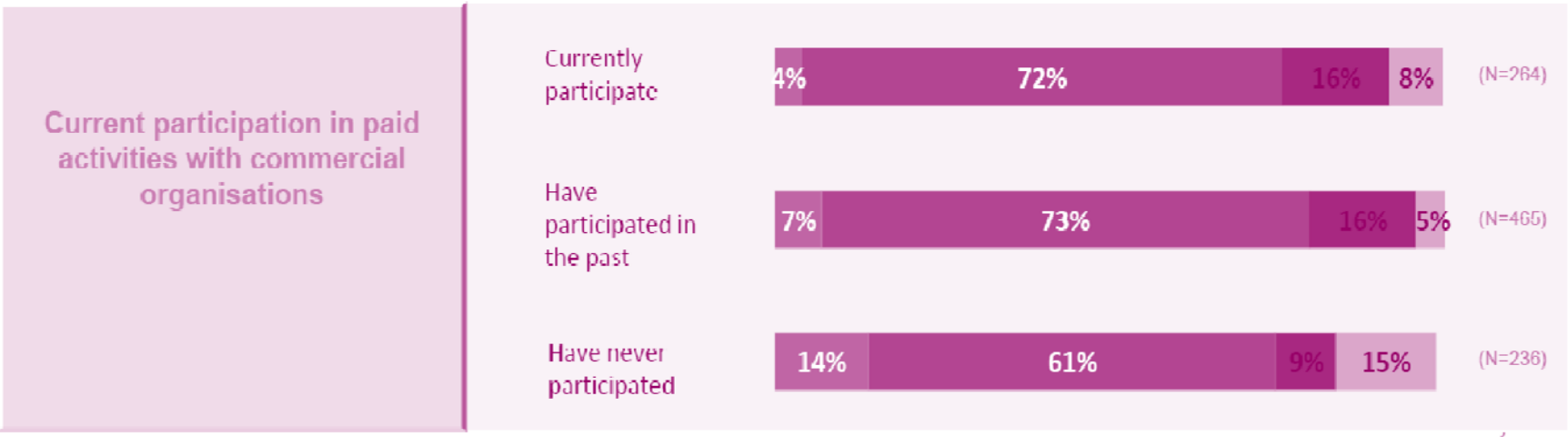
.....that individual health care professionals should play a role in the disclosure of payments received from commercial organisations (e.g. submitting information or validating the information submitted by others), alongside the submission of the same information by industry?



Impact on collaboration

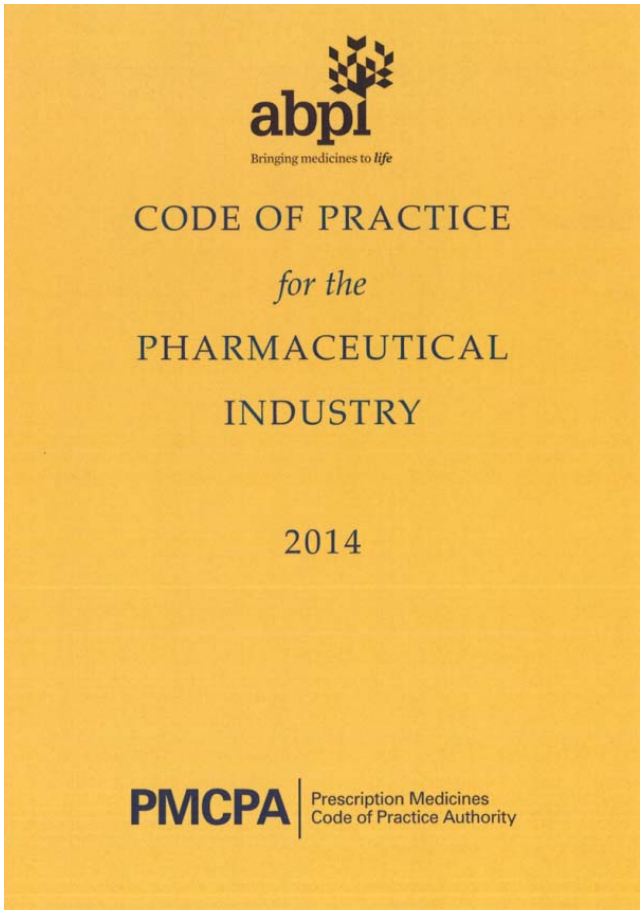
Public Disclosure of Payments could reduce collaboration for 1 in 6 who currently take part in paid activities

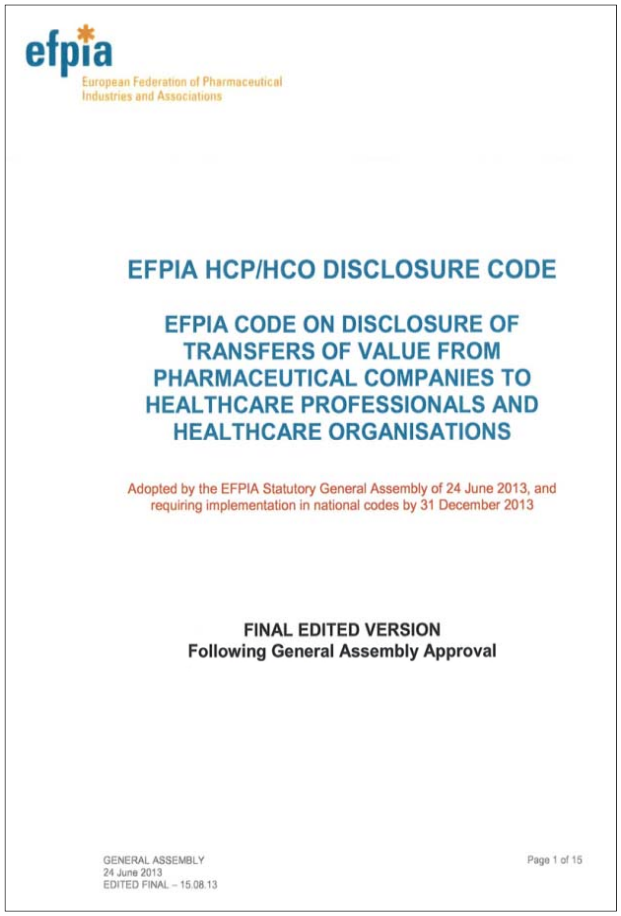
Effect of public disclosure on relationship with commercial organisations – willingness to collaborate in paid activities:



Q7: How would you describe your current level of collaboration with commercial organisations?; Q8: What impact would the public disclosure of payments have on your relationship with commercial organisations? Base: All individuals - 964

Industry response





Format for disclosures

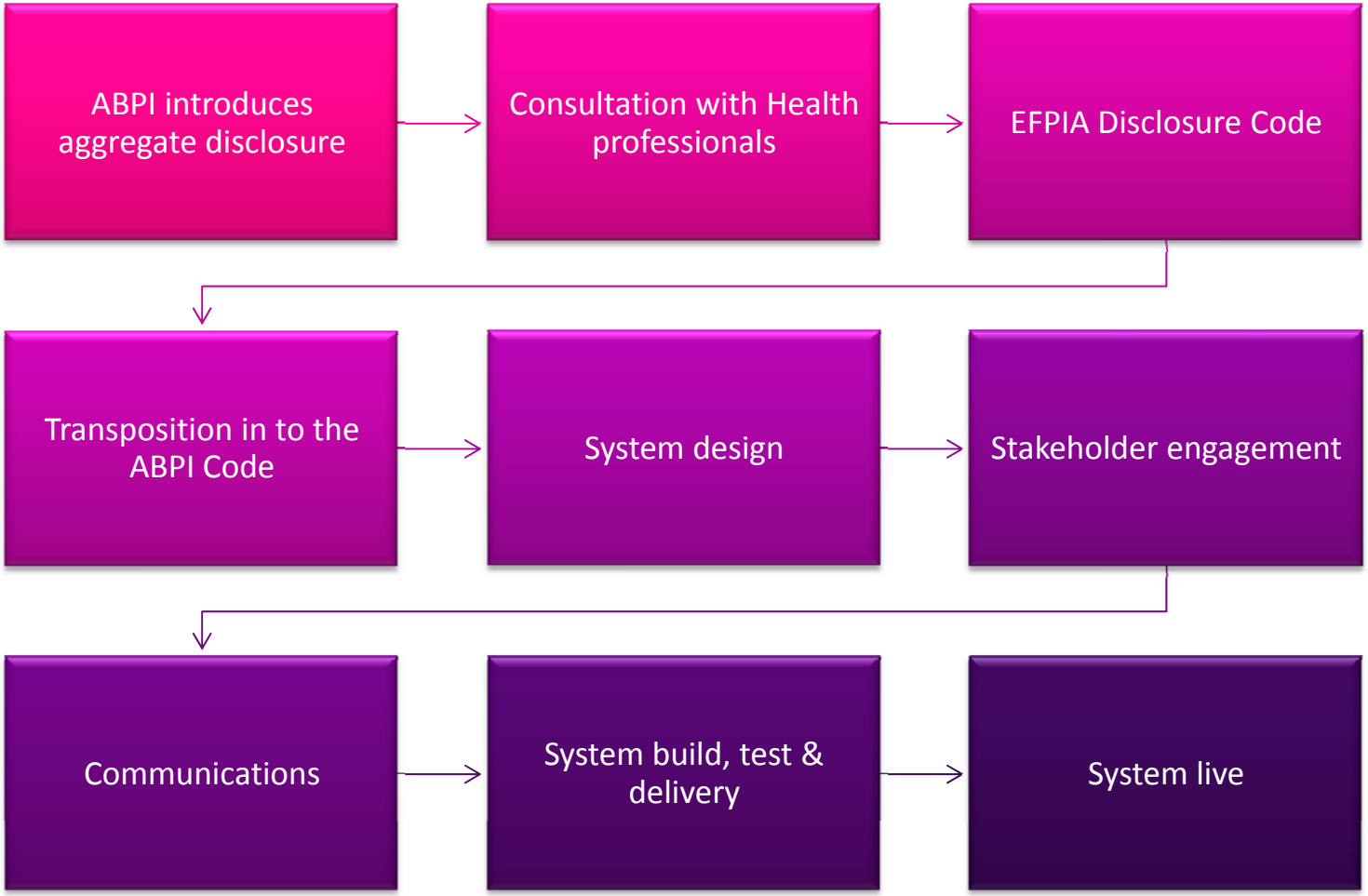
Section 2.04: Platform of Disclosure.

Disclosures can be made in either of the following ways, provided that they are unrestricted and publicly available:

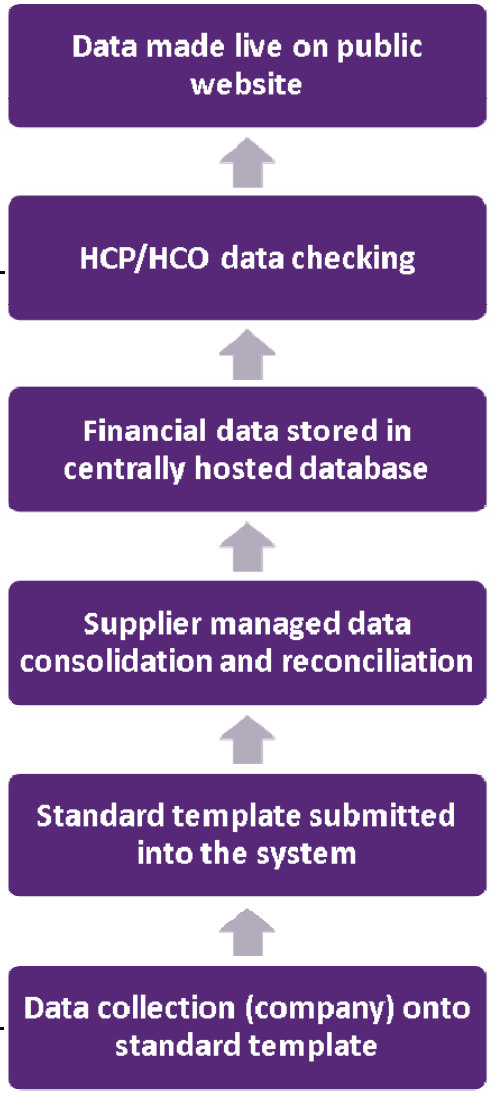
(i) on the relevant Member Company's website in accordance with Section 2.05; or

(ii) on a central platform, such as one provided by the relevant government, regulatory or professional authority or body or a Member Association, provided that disclosures made on a central platform developed at the initiative of Member Associations shall be made, so far as possible, using the structure set forth in Schedule 2.

Where are we now?



How the system will work



The public website will have two components:

1) Search engine (searchable platform)
2) Full disclosure data from companies (alphabetised) on a separate page

HCPs will have a role in checking the financial data from companies prior to publication. Companies have other options regarding checking of data (such as when the contract/written agreement is signed).

Third party will maintain the database and ensure HCP/HCO information is relevant and kept up to date.

This entails adding unique identifiers to all HCPs/HCOs. This process ensures data is clean, complete and up to date but crucially ensures accurate search functionality.

Companies collect payment data and collate into a standard template.

What if consent is not given or withdrawn?

- HCPs will retain the right to refuse to disclosure of their information and will retain their right under the law to seek correction of mistakes or deletion of their information

- The ABPI Code of Practice allows for transfers of value to be reported on an aggregate basis where the health professional cannot be identified for legal reasons; this will include situations where the health professional withdraws or declines to give consent under data protection legislation

- ABPI member companies will not be in breach of their disclosure obligations simply because they work with an HCP who withdraws or refuses to give their consent to disclosure

- The ABPI cannot, and will not, mandate our members to only work with those HCPs who consent to disclosure. It is for companies to decide individually which HCPs they will work with and the terms of those arrangements

Addressing consent to disclose?

Expectation vs. reality

Transparency in context

Delivery in partnership

Leadership

UNCHARTED
TERRITORY

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