

Disclosure UK gateways | Members of the public and patient organisations

1. What is a gateway?

The Disclosure UK gateways publish a collection of hyperlinks to either patient organisation (PO) or members of the public (MoP) disclosure information from pharmaceutical companies abiding by the ABPI Code of Practice.

Under the ABPI Code of Practice, disclosure information related to activities with patient organisations and members of the public are published on individual pharmaceutical company websites. The gateways enable visitors to the Disclosure UK database to quickly find and review the published information.

2. What is a patient organisation?

The 2021 ABPI Code of Practice definition means *an organisation mainly comprised of patients and/or caregivers or any user organisation such as disability organisation, carer or relative organisation and consumer organisation that represents and/or supports the needs of patients and/or caregivers* - [2021 ABPI Code of Practice, Clause 1.15](#).

3. What information is being disclosed about patient organisations?

Since 2006, pharmaceutical companies have been required by the ABPI Code of Practice to publish information about their relationships with patient organisations on their own company websites.

The PO disclosure requirements are set out in the [2021 ABPI Code of Practice, Clause 29](#). The [PMCPA also provides additional guidance](#) to support companies with their disclosure.

4. What information is being disclosed about members of public?

The information about members of the public, including patients and journalists, is **published in aggregate** on individual company websites and started with 2022 data published in 2023.

The MoP disclosure requirements are set out in the [2021 ABPI Code of Practice, Clause 30](#). The [PMCPA also provides additional guidance](#) to support companies with their disclosure.

5. Why did the ABPI launch the Disclosure UK gateways?

The ABPI is committed to improving transparency and has evolved its disclosure requirements over time. The ABPI wanted to increase accessibility to industry's patient organisation and members of the public disclosure information. The patient organisation gateway launched in June 2021, and the members of the public gateway in June 2023 in-line with the first year of disclosures for members of the public recipients. This means that those looking for details about pharmaceutical companies working with those recipient types have a central place to find information.

6. Why was the members of the public gateway launched later?

The requirement to publish information about transfers of value to members of the public on company websites was introduced in the 2021 ABPI Code of Practice, commencing with 2022 data published in 2023.

7. Why isn't this information incorporated into Disclosure UK in the same way as the information about healthcare professionals and healthcare organisations?

The gateways could be delivered relatively quickly, without a change to the ABPI Code of Practice, as the next step to increase the accessibility of this information. Improving transparency is important to us and the ABPI Code of Practice and its Principles will continue to evolve to achieve this.

8. Did introducing the gateways mean the ABPI Code's existing requirements for patient organisation and members of public disclosures changed?

There was no change to the ABPI Code of Practice requirements for either disclosure in relation to the introduction of the gateways on Disclosure UK in 2021 and 2023, respectively.

9. Do companies need permission to share a link to this information via Disclosure UK?

Patient organisation disclosures are already deemed as public information, and the gateway is simply sign-posting visitors to where it can be found.

Members of public disclosures are published in aggregate on company websites therefore a legal basis under the GDPR is not required to make this information public, nor sign-post to it.

10. Is providing links via the Disclosure UK gateways mandatory for pharmaceutical companies?

Providing a link to data via either gateway is not mandatory under the Code, although it is supported by the [2021 ABPI Principle on Transparency](#) and backed by the ABPI Board.

While provision of links is optional, the ABPI expects all companies signed up to the ABPI Code of Practice to work towards providing their links via the Disclosure UK gateways, unless they do not work with patient organisations or members of the public, and therefore have no information to publish.

11. What if a company does not have any patient organisation or members of public disclosures?

The gateways will only display names of companies who have provided a link. It will not show names of companies without this data and have therefore not provided a link.

12. Are the Disclosure UK gateways open to all pharmaceutical companies?

The gateways can be used by any company formally abiding by the ABPI Code of Practice. Companies without HCP/HCO disclosures should contact info@disclosureuk.org.uk to request access to the private disclosure portal to use the gateways.

Companies not currently covered by the ABPI Code of Practice should contact info@pmcpa.org.uk for more information about signing up as a non-member company, or membership@abpi.org.uk for information about becoming a member of the ABPI.