

Temporary changes to publication of 2019 data on Disclosure UK in June 2020

Technical statement - 30 June 2020

- Disclosure UK is the public, searchable database that shows payments and benefits in kind made
 by the pharmaceutical industry to individuals doctors, nurses, other health professionals and
 other relevant decision makers and healthcare organisations in the UK. The values disclosed
 are for either non-R&D or R&D collaborations. Data for each calendar year is published on the
 database by 30 June in the following year www.disclosureuk.org.uk.
- As part of the annual cycle of data verification, the ABPI writes to all individuals and organisations named in companies' disclosure data ahead of its publication at the end of June - over 20,000 in June 2019. Pharmaceutical companies must also have appropriate arrangements in place to lawfully disclose data.
- The ABPI and the PMCPA have agreed that it would not be appropriate to write to NHS workers, hospitals, and other NHS organisations at this time. This would add additional load when the NHS is rightly focussed on responding to the COVID-19 pandemic.
- The ABPI has temporarily published 2019 data in a different way, taking account of the pressures on the NHS in responding to the COVID-19 pandemic
- To prevent the annual communications from being distributed, companies' 2019 non-R&D data has been published on Disclosure UK in aggregate, instead of being broken down by individuals and organisations.
- The value of R&D collaborations is published in aggregate, as usual.
- In the meantime, companies are encouraged to publish the detailed 2019 data on their own websites where able to lawfully and operationally.
- We remain committed to transparency in our collaborations, and the ABPI will explore how the 2019 data can be disaggregated and published on Disclosure UK in the usual manner later.
- This temporary change has only been made because of the unprecedented situation. The ABPI
 will keep the situation under review and plans to arrange for the full disaggregated data to be
 published on Disclosure UK when the external environment allows.

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Q&A

What is Disclosure UK?

- Disclosure UK is the public, searchable database that shows payments and benefits in kind made by the pharmaceutical industry to individuals doctors, nurses, other health professionals, other relevant decision makers and healthcare organisations in the UK.
- These payments and benefits in kind are known as 'transfers of value'.

Why did you not publish disclosure data as normal this year?

- As part of the process of verifying data, and having in place appropriate arrangements to lawfully
 disclose information about transfers of value, the ABPI normally writes to tens of thousands of
 individuals and organisations named in companies' disclosure data ahead of its publication on
 Disclosure UK at the end of June.
- This year, the ABPI and the PMCPA agreed that it would not be appropriate for industry to do
 this when the NHS was rightly focussed on responding to the COVID-19 pandemic.

Why couldn't the ABPI publish individual 2019 data without writing to HCPs or HCOs?

- The ABPI in publishing the information on Disclosure UK has certain responsibilities and as part
 of the disclosure process writes to individuals and organisations to give them an opportunity to
 review the data before it is published on Disclosure UK.
- We built this additional review step into the Disclosure UK process when the central platform was
 first set up following a suggestion from the Information Commissioners Office (ICO). This process
 is hard-wired into the disclosure cycle and ABPI will not publish the data on Disclosure UK without
 doing this.

What are you doing instead?

- To prevent the annual communications from being distributed, companies' 2019 non-R&D data has been temporarily published on Disclosure UK in aggregate, instead of being broken down by individuals and organisations.
- We remain committed to transparency in our collaborations, and the ABPI is exploring when the 2019 data can be disaggregated and published on Disclosure UK in the usual manner later.
- This change is only being made this year because of the situation and the normal disclosure process will be resumed as soon as circumstances allow.

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 Companies are encouraged to publish the detailed 2019 data on their own websites where able to lawfully and operationally.

Are you going to publish the data with the normal breakdowns? When?

We will publish the data, fully broken down as normal, as soon as we are able to. The process
of breaking down the data is known as disaggregation. When we disaggregate the data, we will
still write to healthcare professionals and organisations so they can verify it first, but we will do
so at a more appropriate time when pressures from the pandemic have lessened. We do not yet
know the timescales for this.

Can pharmaceutical companies publish their detailed 2019 data elsewhere?

 Companies are encouraged to publish the detailed 2019 data on their own websites, where able to lawfully and operationally.

Media enquiries

ABPI Press Office

T: +44 (0)20 7747 7147 (24hrs)

E: pressoffice@abpi.org.uk

www.disclosureuk.org.uk

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