

Disclosure of Certain Transfers of Value from Colonis Pharma Limited to Health Professionals and Healthcare Organisations in 2015

Methodology

Colonis Pharma Limited (part of the Quantum Group) has agreed to comply with the ABPI Code of Practice and accept the jurisdiction of the PMCPA.

The Colonis Pharma products available to the UK market during 2015 were predominantly medical devices and one licensed pharmaceutical product. During 2015 there were no transfers of value in relation to the pharmaceutical product that was on the market. Colonis have determined that it is best practice to apply the principles of 'disclosure of transfers of value' to their activities in respect of medical devices. Disclosure for medical devices has been made at an aggregate level.

'The ABPI Code of Practice (20.2) states that HCPs and other relevant decision-making staff may be used as consultants and advisors, whether in groups or individually, for services such as:

- *Speaking at and chairing meetings*
- *Training services*
- *Participation at advisory board meetings*
- *Participation in market research where such participation involves remuneration and/or travel. This applies when the company is aware of the identity of those participating in the market research*
- *Sponsorship in relation to attendance at meetings, which is registration fees and the costs of accommodation and travel.*

As far as healthcare organisations (HCOs) are concerned, benefits in kind, fees for services, contributions towards events and joint working need to be disclosed in addition to existing requirements to disclose grants and donations. The aggregate spend on certain research and development (R&D) and payments made to patient organisations must also be disclosed.'

(Source: ABPI website <http://www.abpi.org.uk/our-work/disclosure/Pages/Individual-disclosure.aspx>)

During 2015 Colonis Pharma made transfers of value in respect of their medical devices in the following areas:

- Sponsorship for meeting attendance (to cover registration fees, travel and accommodation)
- Grants
- Benefits in kind

These have been disclosed at an aggregate level in the template produced by the ABPI which is located on the Colonis website. This information will remain in the public domain for 3 years, and be retained by Colonis for 5 years after the calendar year to which it relates.

The following considerations have been made to accurately record transfers of value

1. VAT:
 - a. VAT incurred for travel and accommodation costs has been included in the total amount disclosed
2. Currency:
 - a. Re-imbusement for costs incurred outside of the UK has been made in GBP using the currency conversion rate in place at the time re-imbusement made
3. Cross-border payments
 - a. These have not been incurred
4. Multi-year contracts
 - a. The payment made in each year is disclosed
5. Non-monetary transfers of value have been included. The financial value has been calculated by:

‘number of units x NHS list price (MIMS)’
6. Disclosure of work for which payment is outstanding:
 - a. In situations where work was conducted in 2015 but invoices not submitted in 2015 the value is NOT included in the 2015 disclosure document. Once invoices are received and payment made they will be recorded in the year that the HCP/HCO receives payment.
7. If payment has been made to a Foundation Trust that covers a number of hospitals the Trust has been counted as 1 HCO.

Amendment 2016

- Colonis had previously made a disclosure of non-monetary value, (medical device samples). According to the ABPI Clause 17, “no more than four samples of a particular medicine may be provided to an individual healthcare professional during the course of a year”
- All reporting for medical devices will be in compliance with **ABHI code of practice**, this has now been amended on the website and has been adjusted accordingly.